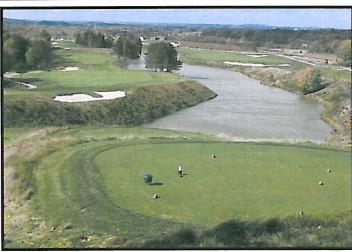
# CITY OF CANTON, OHIO

# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)











Municipal Separate Storm Sewer System (MS4) Operator: City of Canton, Ohio

218 Cleveland Ave. SW - 8th Floor

Canton, Ohio 44702 Phone: 330-438-4307 Fax: 330-489-3282

Attention: Director of Public Service

SWMP Primary Contact: Christopher D. Barnes, PE, CPESC, CPSWQ

Assistant City Engineer

Engineering Department - Civil Division

2436 30th St NE - Building A

Canton, Ohio 44705

Phone (main): 330-489-3381 Phone (direct): 330-438-6908

Fax: 330-489-3337

E-mail: chris.barnes@cantonohio.gov

rice Date: 1/30/2009

ive Date: 1/30/2009

Annual Reports Due: April 1st

Annual Report Period: January - December of previous year

Cover Revised: 1/4/2010

Ohio EPA NPDES General Permit: OHQ000002 Storm Water Associated with: Small MS4 NOI

> Issuance Date: 1/30/2009 Effective Date: 1/30/2009 Expiration Date: 1/29/2014

City of Canton General Permit Approval Date: 6/4/2009

Ohio EPA Facility Permit Number: 3GQ00072\*BG

Table of Organization (per Permit Part III.A.1.d.)

Summary of Departmental Involvement in SWMP Minimum Control Measures and Associated Responsible Persons

The City of Canton's SWMP is comprised of six Minimum Control Measures (MCMs) as required by Ohio EPA NPDES General Permit No. OHQ000002. Several Best Management Practices (BMPs) are used to satisfy requirements of each of the six MCMs. The following is a list of responsible persons (column [5]) that are involved in the implementation of BMPs in the City's SWMP. To find the BMPs for a specific person, use column [6] to identify the MCMs in which involvement is indicated by a "Y". Then find the respective "MCM#\_ Dverview" and "MCM#\_ BMPs" sheets by looking in the lower left corner of the SWMP pages. Each "Responsible Person" should familiarize themselves with the appropriate "MCM#\_ Overview" sheets. On the appropriate "MCM#\_ BMPs" sheets, scan down column #8 or #9 to find the respective responsible person. Then read all of the information within that row for the corresponding BMP to identify specific responsibilities, expectations, etc. The number in parentheses represents the number of BMPs within each MCM that the responsible person is has direct involvement.

Revised

[1]	Overall A		[3] Department	[4] Division		[; Responsit			Dire	ctly involve		6] nplementat	ion? (# of B	MPs)	3/10/201
Entity			pehartment	DIVISION	Position	Name	Phone #	Email	MCM#1	MCM#2	MCM#3	MCM#4	MCM#5	MCM#6	
	Board o	f Health	Health	Environmental Health (EH)	EH Director	Mark Adams	330-438-4641	madams@cantonhealth.org	Y (1)	N	Y (5)	N	N	N	3/10/20
	Jud	ges	Judges	Community Service	Community Service Director	Lindsay Trent	330-438-4214	lindsay.trent@cantonohio.gov	N	Y (1)	N	N	N	N	3/10/20
	Park Cor	mmission	Park		Director	Doug Perry	330-438-6981	doug.perry@cantonohio.gov	Y (1)	Y (1)	Ν	Ν	Y (1)	Y (4)	3/10/20
	Joint Recre	ation District	Recreation	*	Director	Nadine Sawaya	330-438-4894	nadine@cantonrecreation.com	Y (1)	N	N	48	N.	Y (2)	3/10/20
		or)		A-	Mayor	William J. Healy II	330-438-4300	healy@cantonohio.gov	N	N	Ν	N	N	N	1/21/20
		(Mayor)			Management Assistant	Derek Gordon	330-438-4305	derek.gordon@cantonohio.gov	N	Y (1)	N	N	N	N	3/10/2
					Safety Director	Tom Ream	330-438-4312	thomas.ream@cantonohio.gov	N	N	N	Ν	N	N	1/21/20
		Director	Building	Zoning	Zoning Inspector	Darla Hinderer	330-438-4726	darla.hinderer@cantonohio.gov	N	N	N	N	Y (2)	N	3/10/20
		ety D	Fire	A	Fire Chief	John Whitlach	330-438-4540	john.whitlach@cantonohio.gov	Y (1)	N	Y (1)	N	N	Y (6)	3/10/20
		Safety	Police	Impound	Lieutenant	John Rubis	330-438-4485	john.rubis@cantonohio.gov	Y (1)	N	N	N	N	Y (2)	3/10/2
ton	Mayor				Service Director	Warren Price	330-438-4309	warren.price@cantonohio.gov	N	N	N	Ν	N	Y (1)	3/10/2
Canton			Building Maintenance		Supervisor	C. Daniel Millsap	330-438-4191	daniel.millsap@cantonohio.gov	Y (1)	N.	N	N	N	Y (2)	3/29/2
City of			Civic Center		Manager	Geoff Tompkins	330-438-6179	geoff.tompkins@cantonohio.gov	Y (1)	N	Ν	N	N	Y (2)	3/10/2
0			Collection Systems (Sewer)		Superintendent	Jim DiMarzio	330-438-6941	james.dimarzio@cantonohio.gov	Y (1)	N	Y (2)	N	N	Y (5)	3/10/
			Development		Director	Robert Torres	330-438-4123	robert.torres@cantonohio.gov	N	Y (1)	N	N	Y (2)	N	3/10/2
		ector	Division of Motor Vehicles (DMV)		Superintendent	Don Heath	330-438-6959	don:heath@cantonohio.gov	Y (1)	N	N	N	N	Y (7)	3/10/2
		Di	Engineering		City Engineer	Dan Moeglin	330-438-6903	dan.moeglin@cantonohio.gov	Y (1)	N	Y (8)	Y (2)	Y (6)	Y (2)	3/10/2
		Service	Engineering	Civil	Assistant City Engineer	Chris Barnes	330-438-6908	chris.barnes@cantonohio.gov	Y (2)	N	Y (2)	N	N	N	3/10/2
		Š	Engineering	Traffic	Assistant City Engineer	Nick Loukas	330-438-6920	nick.loukas@cantonohio.gov	N	N	N	N	N	Y (3)	3/10/2
			Sanitation		Superintendent	Byron Carson	330-438-6977	byron.carson@cantonohio.gov	Y (2)	N	₩	Ŋ	N	Y (1)	3/10/2
			Street		Superintendent	Kevin Monroe	330-438-6961	kevin.monroe@cantonohio.gov	Y (1)	Y (1)	N	N	N	Y (12)	3/10/2
			Water		Superintendent	Tyler Converse	330-438-6574	tyler.converse@cantonohio.gov	Y (1)	N	N	Ŋ	N	Y (5)	3/10/2
			Water Reclamation Facility (WRF)		Superintendent	Tracy Mills	330-438-4803	tracy.mills@cantonohio.gov	Y (1)	N	N	N	N	Y (5)	3/10/2
	Stark Cou	inty	Soil & Water Conservation	on District (SWCD)	Urban Resource Coordinator	Julie Berbari	330-830-7700	julie.berbari@starkswcd.org	Y (1)	N	N	Y (3)	Y (3)	N	3/29/2
Any questions regarding the City of Canton's SWMP should be directed to the SWMP Primary Contact:  Christopher D. Barnes, PE, CPESC, CPSWQ  Assistant City Engineer  Engineering Department - Civil Division  2436 30th St NE - Building A  Canton, Ohio 44705  Phone (main): 330-489-3381  Phone (direct): 330-438-6908  Fax: 330-489-3337						MCM#2: I MCM#3: I MCM#4: ( MCM#5: I	SWMP's S Public Education and Outreach of Public Involvement/Participation Illicit Discharge Detection and E Construction Site Storm Water F Post-Construction Storm Water Pollution Prevention/Good Hous	limination Runoff Contr Managemen	ater Impact ol at in New De	s evelopment		elopment		3/10/2	

	Prepared by Christopher D. Barnes, PE, CPESC, CPSWQ - Assistant City Engineer - City of Canton, OH	
	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	
	(Permit Part III.B.1.) Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts	Revised
MCM Permit Requ	irement(s)	
Part III.B.1.a.	[City of Canton] shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	
Decision Process	(Rationale Statement) for Development of Storm Water Public Education and Outreach Program	4
Part III.B.1.b.	[City of Canton] shall document [its] decision process for the development of a storm water public education and outreach program. [City of Canton's] rationale statement shall address both [its] overall public education program and the individual BMPs, measurable goals, and responsible persons for [its] program.	
Respons	ETHE City of Canton supports EPA's assessment that an informed and knowledgeable community is crucial to the success of a SWMP since it helps ensure the following: (1) "Greater support" for the program as the public gains a greater understanding of the reasons why it is necessary and important; and (2) "Greater compliance" with the program as the public becomes aware of the personal responsibilities expected of them and others in the community, including the individual actions they can take to protect or improve the quality of area waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <a href="http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm">http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm</a> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.	1/21/2010
	The City of Canton is to implement the BMPs described below as part of its Storm Water Public Education Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Public Education and Outreach on Stormwater Impacts" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.	
Part III.B.1.b.	The rationale statement shall include the following information, at a minimum:	
Part III.B.1.b.i.	How [City of Canton] plans to inform individuals and households about the steps they can take to reduce storm water pollution.	
Respons	Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and households about the steps that can be taken to reduce storm water pollution. There are other means within the City, such as eco-sensitive messages on storm	1/21/2010
Part III,B.1.b.ii.	How [City of Canton] plans to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).	<u> </u>
Respons	Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream cleanups, meetings, etc.). See BMPs below for further details.	1/21/201
Part III.B.1.b.iii.	Who are the target audiences for [City of Canton's] education program who are likely to have significant storm water impacts (inlcuding commercial, and institutional entities) and why those target audiences were selected.	
Respons	The City of Canton is mostly comprised of residential, commercial, industrial, and institutional entities, and as such, these are likely to have significant storm water impacts and therefore are the intended target audiences for the Public Education and Outreach Program. However, each BMP listed below lists the	1/21/2010
Part III.B.1.b.iv.	What are the target pollutant sources [City of Canton's] public education program is designed to address.	
Respons	The City of Canton is located partly or completely within the "East Branch Nimishillen Creek", "West Branch Nimishillen Creek", "City of Canton - Middle Branch Nimishillen Creek", and "Town of East Sparta - Nimishillen Creek" watersheds as described in the Ohio EPA 2010 draf Integrated Report Watershed Assessment Unit (WAU) Summaries. Within these watersheds, the report identifies the following causes of impairments: ammonia, direct habitat alterations, impairment unknown, nitrates, nutrients, organic enrichment (sewage) biological indicators, other flow regime alterations, oxyger (dissolved), sedimentation/siltation, sulfates, and water temperature. The report identifies the following sources of impairment: agriculture, channelization, industrial point sources, municipal (urbanized high density area), municipal point sources, on-site treatment systems (septic systems and similar decentralized systems), source unknown, spills, subsurface (hardrock) mining, and urban runoff/storm sewers. The listed sources are not directly identified with any particular listed causes of impairments. Therefore, the listed impairments and sources are those that the City's Public Education Program is generally intended to address.	ft n 1/21/2010
Part III.B.1.b.v.	What is [City of Canton's] outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) [City of Canton] will use to reach [its] target audiences, and how many people does [City of Canton] expect to reach by [its] outreach strategy over the permit term.	
Respons		1/21/2010
Part III.B.1.b.vi.	Who (person or department) is responsible for overall management and implementation of [City of Canton's] storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.	
Respon	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the overall management and implementation of the Engineering Department of the Engineering Depa	1/21/2010
Part III.B.1.b.vii.	How will [City of Canton] evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	
Respon	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.	orl
Performance Sta	ndards	
Part III.B.1.c.	[City of Canton's] storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. [City of Canton's] storm water public education and outreach program shall reach at least 50 percent of the population over the permit term.	
Annual Reporting	<u> </u>	
Part III.B.1.d.	Annual Reports shall identify each public education mechanism used, including each storm water theme, audience targeting, and an estimate of how many people were reached by each mechanism.	

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.1.) Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts "Storm Water Public Education and Outreach Program": Best Management Practices (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements Part III.A.1.e. Part III.B.1.d. Part IV.B. & C. Part III.A.1.e. Part III.B.1.b.iii. Part III.B.1.b.v. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.c. Part III.A.1.a. Part III.B.1.b.v. Part III.A.1.a. [11] [7] [9] [10] [12] [13] [14] [4] [5] [1] [2] [3] [3A] Responsible Measurable Goal(s) for Rationale for Information for Information for Further Guidance Taget Audience Target BMP Name BMP Type and Theme or BMP/Mechanism Description Rationale for Legal Agreemen BMP Permit BMP/Mechanism Selection (see USEPA's (Specific Audience) Audience Authority to Entity/ City Needed? Each Responsible Measurable Responsible Responsible Message Requirement Goal(s) Position(s) to Position Position(s) to Estimated % Dept(s): National Menu of Implement? Selection Document for Maintain for Stormwater BMPs of Overall Position(s) Annual Reports Audits Population) Website) Education programs for Stated goals developers and the public (1) Copy of MOU (1) Renew MOU between are easily 1) Indication of MOU about project designs that City and Stark SWCD and payment measurable (Refer to all USEPA Through a Memorandum of Understanding renewal; and minimize water quality annually; and verification; and BMPs under MCM#5 and/or demand between the City of Canton and the Stark mpacts are considered non Storm water Storm water Stark SWCD: indication if Post-Construction SWCD, the Stark SWCD provides annual Workshops addressing Development structural post-construction education for education for RMP training opportunities for the development Storm Water <1 Yes Urban Resource Yes roject designs that minimize BMPs per MCM#5 (Part community (2) once per year, Stark (2) workshop name development development Coordinator nplementation Management in Nev community. Workshops are offered that focus water quality impacts III.B,5,e.iii.). All permit SWCD is to offer at least date, number of (2) workshop community community on construction sile and post-construction Development and is in training/education I respective workshop to attendees, attendee flyer/agenda, accordance Redevelopment) storm water quality controls. requirements are to be local developers, representation. attendance list with permit coordinated, if possible, to contractors, and training location, handouts, etc. expectations avoid duplication of efforts. engineers topics covered Copy of flyer; Flyers addressing hazards Distribute flyer to all new Estimate of # of flyer Stated goals The City's Sanitation Department is involved records verifying associated with illegal Sanitation customers 90 sanitation customers and distributed and brief are easily with trash disposal and waste management new sanitation discharges and improper upon request description of conten measurable The Sanitation Department distributes trash customers disposal of waste "Trash and Debris Such education is required ind/or demand management educational flyers to all new for MCM #3 (Part III.B.3.f.). Management" (under Once per year send email Illegal discharge Email addressing hazards indication if Date email was sent sanitation customers and upon request. The llegal discharge and USEPA MCM#1: Sanitation: to City Department heads All permit training/education and trash associated with illegal City employees <1 Yes No BMP and brief description Copy of email 2 flyers are also made available at various City trash management Superintendent Public Education and to post and share with requirements are to be management discharges and improper plementation of content lepartments. Also, the Sanitation departmen education Outreach on Storm employees coordinated, if possible, to disposal of waste education is in is to provide illegal discharge and trash avoid duplication of efforts. Water Impacts) Article addressing hazards accordance management education to public employees Once per year provide Date article was associated with illegal with permit via email and to the general public via articles Copy of article General public 100 educational article in provided and brief discharges and improper expectations in the City's quarterly publication. City's quarterly publicatio lescription of conter disposal of waste Street: Street Superintendent Civic Center: (1) Indication if Civic Center Manager "Storm Watch" Engineering: (1) Utilize "Storm Watch" training kit was Engineering Municipal employee training is necessary to Engineer training kit (available at utilized to train teach staff about potential sources of (Sewer): City Engineering Dept) appropriate CSD (Sewer) stormwater contamination and ways to annually to train employees; Superintendent ninimize the water quality impact of municipal appropriate employees; respective training Sanitation: Supporting activities. The City previously purchased a Sanitation Stated goals date(s); # of Superintendent training Municipal Storm Water Pollution Prevention Workshops, literature, etc. are easily employees trained; DMV: Government Such education/training is "Municipal Employee documentation addressing prevention and Storm Watch - Everyday BMPs" training kit DMV measurable employee Superintendent which includes a DVD and a kit lest for required per MCM #3 (Part Training and specifying date. reduction of storm water and/or demand training/ Building Maint. III.B.3.f) and MCM #6 (Parts Education" (under Building attendance list, employees which is to be used to assist in pollution from activities such indication if education to Government USEPA MCM#6: Superintendent respective implementing this BMP. Specific topics III.B.6.a. and b. and Part Maintenance as park and open space <1 Yes BMP 3 employee training/ prevent and training flyer/ include, but are not limited to: good III.B.6.e.). All permit training Pollution Prevention/ (Impound): maintenance, fleet and implementation education reduce storm housekeeping and spill prevention, vehicle requirements are to be Good Housekeeping Lieutenant agenda: building maintenance, new (Impound) is in water pollution description of coordinated, if possible, to for Municipal and equipment washing and maintenance, construction and land Water: accordance Water from municipal (2) description(s) of training resource spill response and reporting, street and lot avoid duplication of efforts Operations) disturbances, and storm Superintendent with permit other relevant operations used, as maintenance, proper storage of materials, water maintenance expectations Park: Director Park (2) as feasible, utilize training/ education applicable landscaping and lawn care, etc. Also, there other relevant training resource(s) used to are various training/education opportunities Recreation: education resources train appropriate Recreation provided incoughout the year via conferences Director available to train employees: training sessions, seminars, etc. by outside Health: EH appropriate employees respective training resources in which employees attend. Health Director date(s); # of employees trained Fire Fire: Chief WRE WRF Superintenden

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				CITY OF CANTON, OHI	O: NPDES PHAS	SE II STORI	WATER M	MANAGE	MENT F	ROGRAM	A (SWM	P)			
				(Permit Part III.B.1.) Minim	num Control Measur	e (MCM) #1: P	ublic Educatio	n and Outr	reach on S	Storm Wate	r Impacts				
"Stor	m Water Public	Education and O	utreach Program": Bes	t Management Practices (BMPs)/Publ	ic Education Mechanisn	ns used to Satisfy	MCM Requireme	nts							
		Part III.A.1.a.	Part III.B.1.b.v.	Part III.A.1.a.	Part III.A.1.e.		Part III.B.1.b.lili.	Part III.B.1.b.v.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.1.d.	Part IV.B. & C.
[1] BMP #	[2] Permit Requirement	[3] BMP Name	[3A] BMP Type and Theme or Message	[4] BMP/Mechanism Description	[5] Rationale for BMP/Mechanism Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Taget Audience (Specific Audience,	[7A] Target Audience (Estimated % of Overall Population)	[8] Legal Authority to Implement?	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
4	Public education on storm water impacts	Quarterly publication	City quarterly publication addressing various storm water topics	The Assistant City Engineer provides storm water news and education through the "Runof Rundown" section of the quarterly publication. Sometimes educational materials made available by EPA are utilized within the publication.	, , , , , ,	"Developing an Outreach Strategy" & "Educational Displays, Pamphlets, Booklets, and Bill Inserts" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts)	General public	100	Yes	Engineering (Civil): Assistant City Engineer	No	Provide 1 storm water education article/educational resource in each of 4 yearly publications	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Brief descriptions of articles/resources and publication dates; estimate of how many people received publication	Copy of articles/ resources; estimate of # of recipients
5	Public education on storm waler impacts	City website	City website addressing various storm water topics	The Engineering Department has the ability to add information to the website as needed, and therefore is to ensure that storm water educational materials and/or links are provided.		"Developing an Outreach Strategy" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts)	General public	?	Yes	Engineering (Civil): Assistant City Engineer	No	Continually provide storm water education materials/links on City website	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Description of types of storm water education resources/links provided on website, relevant updates, etc	

Prepared by Christopher D. Barnes, PE, CPESC, CPSWQ - Assistant City Engineer - City of Canton, OH	
CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revised
[City of Canton] shall comply with State and local public notice requirements and satisfy this minimum control measure's minimum performance standards when implementing a public involvement/participation program.	
Rationale Statement) for Development of Storm Water Public Involvement/Participation Program	
[City of Canton] shall document [its] decision process for the development of a storm water public involvement/participation program. [City of Canton's] rationale statement shall address both [its] overall public involvement/participation program and the individual BMPs. measurable goals, and	
The City of Canton supports EPA's assessment that the City should involve the public in developing, implementing, updating, and reviewing its SWMP. The Storm Water Public Involvement/Participation Program should make efforts to reach out and engage various economic and ethnic groups. The public can provide valuable input and assistance to the City's SWMP and, therefore, that the public be given opportunities to play an active role on both the development and implementation of the SWMP. An active and involved community is crucial to the success of a SWMP because it allows for: (1) "Broader public support" since citizens who participate in the development and decision-making process are partially responsible for the program and, therefore, may be less likely to raise legal challenges to the program and more likely to take an active role in its implementation; (2) "Shorter implementation schedules" due to fewer obstacles in the form of public and legal challenges and increased sources in the form of citizen volunteers; (3) "A broader base of expertise and economic benefits" since the community can be a valuable, and free, intellectual resource; and (4) "A conduit to other programs" as citizens involved in the SWMP development process provide important cross-connections and relationships with other community and government programs.	1/21/2010
See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <a href="http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm">http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm</a> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Storm Water Public Involvement/Participation" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.	
The rationale statement shall include the following information, at a minimum:	<u></u>
Has [City of Canton] involved the public in the development and submittal of [its] NOI and SWMP description?	
e: Throughout the planning stages of preparing for NPDES Phase II under the initial 2003 permit, the City of Canton had meetings with the Stark County Regional Planning Commission (RPC) to specifically discuss the NPDES Phase II program requirements and plan preparation strategy. These were mostly informative meetings for the City of Canton. Stark RPC held public meetings in which NPDES Phase II updates were provided and public input was welcomed. Also, NPDES Phase II plan preparation strategy and partnership with Stark RPC was discussed at City Council meetings in which public input was welcomed. However, no public input was received and therefore the general public was not a factor in the development and submittal of the City's Notice Of Intent (NOI) and SWMP.	1/21/2010
What is [City of Canton's] plan to actively involve the public in the development and implementation of [its] program?	
obtain information, report concerns, and provide comments on various issues to the City in person, by phone, mail, or email. Public involvement in the development of the City's SWMP has unfortunately been non-existent. Public implementation of the SWMP can be determined by the success of meeting the various manual reports as reported in annual reports since 2003.	is 1/21/2010
Who are the target audiences for [City of Canton's] public involvement program, including a description of the types of ethnic and economic groups engaged? [City of Canton] is encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial	
er The general public, which is made up of various types of ethnic and economic groups, is the overall target audience for the City of Canton's Storm Water Public Involvement/Participation Program. However, each BMP listed below lists the specific target audience it is intended to reach.	1/21/2010
What are the types of public involvement activities included in [City of Canton's] program? Where appropriate, consider the following types of public involvement activities: citizen representatives on a storm water management panel, public hearings, working with citizen volunteers willing to educate others about the program, yolunteer monitoring or stream/beach clean-up activities.	
e: Public involvement activities range from street, neighborhood, and park cleanups to watershed groups. See BMPs below for further information.	1/21/2010
Who (person or department) is responsible for the overall management and implementation of [City of Canton's] storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program?	
Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the Engineering Department is the primary contact for the SWMP and responsible for the SWMP and responsib	1/21/2010
How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	
In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually, Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.	OI I
ndards	<u></u>
[City of Canton's] storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit ferm.	
Annual Reports shall identify each public involvement/participation activity conducted, including a brief description of activity and shall include an estimate of how many people participated.	4
	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)  (Permit Part III.B.2.) Minimum Control Measure (MCNI) #2: Public Involvement/participation  Francisco  (Permit Part III.B.2.) Minimum Control Measure (MCNI) #2: Public Involvement/participation  Francisco  (Permit Part III.B.2.) Minimum Control Measure (MCNI) #2: Public Involvement/participation  Francisco  Francisco

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.2.) Minimum Control Measure (MCM) #2: Public Involvement/Participation "Storm Water Public Involvement/Participation Program": Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements Part III.A.1.c. Part III.B.2.d. Part IV.B. & C. Part III.B.2.b.iii. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.e. Part III.A.1.a. Part III.A.1.e. Part III.A.1.a. Part III.B.2.b.iv. [10] [12] [13] [14] [5] [7] [3A] [1] [2] [3] Rationale for BMP/Activity Further Guidance Legal Responsible Agreement Measurable Goal(s) for Rationale for Information for Information for Target BMP Name BMP/Activity Description BMP Type and Theme or BMP Permit Each Responsible Measurable Responsible Responsible Needed? (see USEPA's Entity/ City Selection Audience Authority to Message Requirement National Menu of Dept(s): Position Goal(s) Position(s) to Position(s) to mplement Document for Maintain for Selection Stormwater BMPs Position(s) Annual Reports Audits Website) Stated goal is easily In 2006, the City of Canton Street Department introduced the BAN measurable Supporting Program with the objective of fostering neighborhood beautification (Refer to all Public and/or Brief description of documentation through a dedication of public resources to those neighborhood Involvement activity (including Public demands uch as copies of groups willing to assist the City in the process. Street Department Cleanups prevent litter and Neighborhood associations Utilize all 9 days set aside Participation BMPs City Beautify A involvement/ date(s), location(s) Street: indication if activity trash from washing into the partnering with City Street employees assist residents with neighborhood cleanup projects. per year for neighborhood on USEPA's National Neighborhood Yes 1 participation in Neighborhood **BMP** etc., if possible); advertisement, Superintendent The BAN Program establishes scheduled dates for the City and City's MS4 and polluting local Department to conduct Menu of Best Associations cleanups (BAN) Program mplementation estimate of # of storm water sian-up/ neighborhood groups to partner up for neighborhood cleanups, one water bodies neighborhood cleanups Management activity participants attendance neighborhood at a time. None days are scheduled between April Practices) accordance sheets, etc. 1st and October 31st of each year. Any individual or organization with permit within the City can apply for one of the available dates. expectations Stated goals (1) Continue to partner (1) Indication of (1) Copy of are easily with Stark Community ontinued partnership partnership measurable (Refer to all Public The City of Canton's Development Department and some private Cleanups prevent litter and Foundation to provide the with SCF; and agreement; and and/or demand partners have a joint funding partnership with Stark Community trash from washing into the Involvement/ NPGP; and Public Stark Community City indication if Participation BMPs Foundation (SCF) in which funds are provided from the City via the City's MS4 and polluting local Foundation's Grant program for involvement/ Neighborhood Yes, via Development: BMP Yes 2 Neighborhood Partnership Grant Program (NPGP) to water bodies. See on USEPA's Nationa neighborhood associations to participation in Neighborhood Director Associations partnership (2) # of community (2) supporting Menu of Best mplementation www.starkcf.org/neighborhoo neighborhood associations to help conduct various activities storm water Partnership Grant conduct community cleanups and residents cleanups conducted; documentation is in d partnership.asp for more Management including community cleanups. Most participating neighborhood activity Program (2) conduct community brief description (copy of activity Practices) accordance details associations conduct two cleanups per year. cleanups every year date(s), location(s) advertisement, with permit estimate of # of sign-up sheets. expectations participants) etc.) Stated goal is easily measurable (Refer to all Public When the Canton Municipal Court sentences people to perform Brief description of Supporting and/or Continue to utilize Road Involvement/ community service, some of the people are assigned to the Road Public activity (including documentation demands Cleanups prevent litter and Canton Muncipal Crew Cleanups as a Participation BMPs Judges: Crew. The Canton Municipal Court's Road Crew picks up litter and General public sentenced to involvement/ indication if date(s), location(s) such as copy of Community trash from washing into the Court's Community trash from the streets of Canton as well as cleaning up nuisance on USEPA's National Community No means of required 3 community service participation in BMP etc., if possible); Road Crew City's MS4 and polluting loca service workers Service Road Crew Service Director community service for the Menu of Best properties for the City of Canton's Code Enforcement and Health performing cleanups storm water estimate of # of policies, lists of mplementation water bodies. Cleanups general public Department. Certain areas are targeted based on complaints Management activity participants participants, etc. is in Practices) received. accordance with permit expectations Stated goal is easily measurable (Refer to all Public and/or Brief description of Supporting Involvement/ activity (including Public documentation demands Cleanups prevent litter and Participation BMPs Various cleanup and beautification activities take place within Conduct one Canton Park date(s), location(s) (copy of activity involvement/ indication i trash from washing into the Canton Parks Cleanup and beautification on USEPA's National General public Park: Director No Canton Parks throughout the year. Many of these parks have **BMP** participation in etc... if possible): advertisement City's MS4 and polluting loca cleanup per vear Cleanups activities within Canton Parks streams, ponds, lakes, or wetlands located within them. Menu of Best storm water estimate of # of sign-up sheets, mplementatio water bodies Management activity participants is in etc.) Practices) accordance with permit expectations Stated goal is Mayor William Healy, Canton City Schools, local McDonald's easily franchisees, and Wal-Mart team up with residents to improve the (Refer to all Public measurable Brief description of Supporting appearance of city streets by cleaning up unsightly litter and other and demands Involvement/ **Public** activity (including documentation Cleanups prevent litter and garbage at designated locations. Volunteers are provided with indication if Conduct one Participation BMPs Mayor: involvement/ date(s), location(s), (copy of activity trash from washing into the General public Neighborhood cleanups and cleanup materials and also receive a free lunch donated by Geep Canton Clean BMP on USEPA's National Yes Management No eighborhood cleanup pe 5 participation in etc., if possible); advertisement McDonald's. The cleanup is done in conjunction with Canton City City's MS4 and polluting local and students Program pollution education implementation Menu of Best Assistant storm water estimate of # of sign-up sheets, Schools' Keep Canton Clean Education Series which informs water bodies. Management is in activity students about the short and long-term ramifications of littering and participants elc.) accordance Practices) pollution, as well as some of the serious challenges city employees with permit face with regard to litter, pollution, and illegal dumping. expectations

	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revi
	(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination	
CM Permit Requ	promont(s)	
Part III.B.3.a.	[City of Canton] shall develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in Part IV of the permit, into its MS4 via an adjacent, outside-of-jurisdiction-interconnected-MS4, [City of Canton] is only required to inform the	
Part III,B,3.b.	[City of Canton] shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when [City of Canton's] coverage [City of Canton] shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when [City of Canton's] coverage [City of Canton] shall develop, if not already completed, a comprehensive storm sewer system map shall also include [City of Canton's] [City of Canton's] (City of Canton's] [City of Canton's] (City of Canton's] [City of Canton's] (City of Canton's] (City of Canton's), post-construction water quality BMPs and private post-construction water quality BMP requirements. If [City of Canton] will be unable to develop [its] comprehensive storm sewer system map during this permit term, [City of Canton] shall provide an alternative schedule to complete with [its] 2009 Annual Report.	
Part III.B.3.c.i.	Within five years of when [City of Canton's] initial Small MS4 general permit coverage was granted (04/03/2003), [City of Canton] shall submit the following to Ohio EPA:	
Part III.B.3.c.i.	A list of all on-site sewage disposal systems connected to discharge to [City of Canton's] MS4 (a.k.a. home sewage treatment systems (HSTSs)) including addresses; and	
Part III.B.3.c.ii.	A storm sewer map showing the location of all HSTSs connected to [City of Canton's] MS4. This map shall include details on the type and size of conduits/ditches in [City of Canton's] MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from [City of Canton's] MS4.  Canton's] MS4.	
Part III.B.3.d.	[City of Canton] shall, to the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges into [City of Canton's] storm sewer system and implement appropriate enforcement procedures and actions.	
Part III.B.3.e.	[City of Canton] shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to [City of Canton's] system. At a minimum, for household sewage treatment systems (HSTSs), [City of Canton's] plan shall address or include provisions for:	
Part III.B.3.e.i.	Working with the appropriate Board(s) of Commissioners, other public officials, local waste water authorities, any other appropriate entity and local board(s) of health, to proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly, and economically connected to central sewers. At a minimum, the plan shall evaluate applying provisions identified by ORC 6117.51 and other applicable State and local laws and/or regulations. At a minimum, this activity should require connection to central sewers for any discharging HSTS that is not operating as designed and intended if feasible, butit does not preclude connection to central sewers of any HSTS if local planning and coordination recommends such;	
Part III.B.3.e.ii.	Working with local board(s) of health to develop a proactive operation and maintenance program or implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSs are operating as designed and intended and, for those not meeting this criteria, requires elimination, upgrade, or replacement of the systems as appropriate. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage and intended and, for those not meeting this control is a control of the systems as appropriate. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage.	
Part III.B.3.e.iii.	Actively investigating the source(s) of contamination in outfalls during dry weather screening process. When the contamination source has been identified as discharging HSTS that is not operating as designed and intended, work with the local board(s) of health to determine proper course of action in resolving the non-functioning HSTS with connection to central sewers being preferred alternative, followed by replacing systems with a soil absorption system that does not discharge and only allowing a replacement discharging HSTS when no other option is available. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit; and	
Part III.B.3.e.iv.	Working with local waste water authorities, planning agencies or other appropriate agencies involved to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSs.	1
Part III.B.3.f.	[City of Canton] shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and	
Part III.B.3.g.	[City of Canton] shall address the following categories of non-storm water discharges or flows (i.e. illicit discharges) only if [City of Canton] identifies them as significant contributors of pollutants to [City of Canton's] small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residention car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges from fire fighting activities (by definition, not an illicit discharge).	
Part III.B.3.h.	Icity of Canton] may also develop a list of other similar occassional incidental non-storm water discharges (e.g. non-commercial or charity car washes, etc.) that will not be addresses as illicit discharges. These non-storm water discharges must not be reasonably expected (based on [City of Canton] may also develop a list of other similar occassional incidental non-storm water discharges or conditions [City of Canton] may also develop a list of other similar occassional incidental non-storm water discharges as illicit discharges. These non-storm water discharges must not be reasonably expected (based on formation available to the permittees) to be significant sources of pollutants to the MS4, because of either the nature of the discharges as illicit discharges. In the water discharges or conditions placed for allowing these discharges to [City of Canton's] MS4 (e.g. a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). [City of Canton's] SWMP any local controls or conditions placed on the discharges. [City of Canton] must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to [City of Canton's] MS4.	
ecision Process	e (Pationale Statement) for Development of Storm Water Illicit Discharge Detection and Elimination (IDDE) Program	4
Part III.B.3.i.	[City of Canton] shall document [its] decision process for the development of a storm water illicit discharge detection and elimination program and the individual BMPs,	
Respon	nse: The City of Canton supports EPA's assessment that the implementation of an effective IDDE Program allows the City to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means are legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means are legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means are legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means are legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means are legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, the city to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, the city to gain a thorough awareness of its MS4 which allows the city to determine the types and sources of illicit discharges entering the MS4 and establish the city to gain a thorough awareness of its MS4 which allows the city to determine the types and sources of illicit discharges entering the many and the city to gain a thorough awareness of its MS4 which allows the city to gain a thorough awareness of its MS4 which allows the city to determine the city to gain a thorough awareness of its MS4 which allows the city	1/21
	The City of Capton is to implement the BMPs described below as part of its IDDE Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Illicit Discharge Detection and Elimination" on USEPA's National Menu of Stormwater Best	
	The City of Canton is to implement the BMPs described below as part of its IDDE Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Illicit Discharge Detection and Elimination" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.	$\vdash$
Part III.B.3.i,	Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with	-
Part III.B.3.i.i.	Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton] used for the maps, and how [City of Canton]	1/21
Part III.B.3.i.i. Respor	Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If aiready completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.  The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton] needs to develop this mechanism.	
Part III.B.3.i.i. Respor	Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.  The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used	1/21
Part III.B.3.i.i. Respor Part III.B.3.i.li. Respor	Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.  The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm	1/21
Part III.B.3.I.i. Respor Part III.B.3.Lii. Respor	Management Practices at http://cfpub.ep.a.gov/inpdes/stormwater/menuofbmps/ for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sever map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.  The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "New Paps" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" includes prohibitions and enforc	1/21
Part III.B.3.i.i. Respor Part III.B.3.i.ii. Respor Part III.B.3.i.iii. Respor	Management Practices at <a href="http://cfpub.epa.gov/inpdes/stormwater/menuc/bmps/">http://cfpub.epa.gov/inpdes/stormwater/menuc/bmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sever map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] glocations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance "includes prohibitions and enforcement mechanisms to ensure two developed in the minimum control measure." In 2009, a new storm water management ordinance was adopted. See "Storm water	1/21
Part III.B.3.i.i. Respor Part III.B.3.i.ii. Respor Part III.B.3.i.iii. Respor	Management Practices at http://cipub.epa.gov/mpdes/stormwater/menuotemps/ for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and locations of all outfalls and the names and locations of all outfalls and the names and locations of all outfalls are with field surveys. If already completed, describe how [City of Canton] developed in surface waters of the State that receive discharges from those outfalls' as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] received ischarges from those outfalls' as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Cantons] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism is already developed, include a copy of the relevant sections with [City of Cantons] program.  The City of Canton is to utilize an ordinance as the regulatory mechanism is already developed, include a copy of the relevant sections with [City of Cantons] program.  The City of Canton is plan to ensure through appropriate enforcement procedures and actions that [its] fillicit discharge ordinance (or other regulatory mechanism) is implemented.  The City of Canton's Joint on ensure through appropriate enforcement procedures and actions that [its] system, including disch	1/21
Part III.B.3.i.i. Respor  Part III.B.3.i.ii. Respor  Part III.B.3.i.iii. Respor	Management Practices at <a href="http://cpub.epag.gov/inpdes/stormwater/menuchmps/">http://cpub.epag.gov/inpdes/stormwater/menuchmps/</a> for further BMP guidance and information.  The rationale statement shall include the following information, at a minimum:  How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with feld surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] and the names and location of all surface waters of the State that receive discharges from those outfalls "as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism fordinance or other regulatory mechanism [City of Canton] will use to effectively of canton as a state of the state that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism fordinance or other regulatory mechanism for locations of all surfaces with [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton] permit is to be added to that mechanisms as a location is a plan and a schedule to do so. If [City of Canton is program.  The City of Canton is unitiate and contained as the regulatory mechanism for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intended in th	1/21
Part III.B.3.i.i. Respor Part III.B.3.i.ii. Respor Part III.B.3.i.iii. Respor	Management Practices at <a href="http://cipub.epa.gov/npdes/stormwater/menu@mps/">http://cipub.epa.gov/npdes/stormwater/menu@mps/</a> In The rationale statement shall include the following information, at a minimum:  How [City of Ganton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Ganton] developed this map. Also, describe how [City of Canton] will use very stem map, showing locations of all outfalls and the names and locations of all surfaces waters of the State that receive discharges from those outfalls' as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively position will little it discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  Intelligent of Canton's ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  Intelligent or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  Intelligent or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.  Intelligent or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.	1/21
Part III.B.3.i.ii. Resport Part III.B.3.i.iii. Resport Part III.B.3.i.iii. Resport Part III.B.3.i.iv.1. Resport Part III.B.3.i.iv.1.	Management Practices at <a and="" bmp="" cipub.eaa.gov="" firmps"="" for="" further="" guidance="" href="http://icfpub.gas.gov/ingdes/sfortmwater/instruct/bases/ator/mwater/instruct/bases/ator/mwater/instruct/bases/ator/mwater/instruct/bases/ator/mwater/instruct/bases/ator/mwater/instruct/bases/ator/mwater/bases/ator&lt;/td&gt;&lt;td&gt;1/21 1/21 1/21 1/21 1/21&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;Part III.B.3.i.ii. Respon  Part III.B.3.i.iii. Respon  Part III.B.3.i.iii. Respon  Part III.B.3.i.iv.  Respon  Part III.B.3.i.iv.1.  Respon&lt;/td&gt;&lt;td&gt;Management Practices at &lt;a href=" http:="" indes="" information."="" menu="" stormwater="">http://cipub.eaa.gov/indes/stormwater/menu/firmps</a> for Canton] will develop a comprehensive storm sewer map showing the location of all outalis and the names and locations of all irreceiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outali locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton] may will be regularly updated.  The city of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.  The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit lilicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton is to utilize a nordinance as the regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton is to utilize a nordinance as the regulatory mechanism prohibit lilicit discharges into the NS4 and why [City of Canton is to utilize a nordinance as the regulatory mechanism prohibit lilicit discharges with the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory interhains as the regulatory mechanism prohibit lilicit discharges into the the typical legislatory interhains in a life seed of	1/21 1/21 1/21 1/21 1/21 1/21

### Prepared by Christopher D. Barnes, PE, CPESC, CPSWQ - Assistant City Engineer - City of Canton, OH

	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revised
	(Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination	
Part III.B.3.I.Iv.4.	Procedures for program evaluation and assessment.	
Respons	ise: The City of Canton has procedures in place for program evaluation and assessment. See "Storm Water IDDE Program evaluation and assessment" BMP below for further details.	1/21/2010
Part III.B.3.i.v.	How [City of Canton] plans to inform public employees, businesses, and the general public education minimum measure and improper disposal of waste. Include in [City of Canton's] description how this plan will coordinate with [City of Canton's] public education minimum measure programs.	
Respons	The City of Canton informs public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste via flyers, emails, articles in publications, workshops, etc. See "Illegal discharge and trash management education" BMP below for further details.	1/21/2010
Part III.B.3.i.vi.	Who is responsible for overall management and implementation of [City of Canton's] storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.	
Respons	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's IDDE Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/2010
Part III.B.3.i.vii.	How (City of Canton) will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	
Respons	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually, Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.	1/21/2010
Performance Star	ndards	A
Part III.B.3.j.	The City of Canton's Storm Water IDDE Program shall include or have included an initial dry-weather screening of all storm water outfalls over the permit term. The City of Canton's IDDE Program shall establish priorities and specific goals for long-term system-wide surveillance of the City's MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. The City of Canton's comprehensive storm sewer system map shall be updated annually as needed.	
Annual Reporting	9	- Control
Part III.B.3.k.	Annual Reports shall document the following: (1) number of outfalls dry-weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5) schedules for elimination of illicit connections that have been identified but have yet to be eliminated, and (6) summary of any storm sewer system mapping updates.	

# CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination

torr	n Water Illicit Discharge De	The Artist Control of the Control of	nation (IDDE) Program": Best Management Practices (BMPs)/Requirements (		quirements	Tarrage street	r 2: :			( a		1 =
		Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.a.		Part III.A.1.e.		Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.3.k.	Part IV.B. & C.
I] ИР ₹	[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] Responsible Entity/ City Dept(s): Position(s)	[9] Agreement Needed?	[10] Measurable Goal(s) for Each Responsible Position	[11] Rationale for Measurable Goal(s) Selection	[12] Information for Responsible Position(s) to Document for Annual Reports	[13] Information for Responsible Position(s) to Maintain for Audits
1	Comprehensive storm sewer system map	MS4 map	The City Engineering Department maintains hard copies of maps of storm and sanitary sewers, based on "as-built" data. These maps were used as a starting point for creating an electronic "base map" that was used to satisfy initial 2003 NPDES Small MS4 Permit requirements. Additional information as required in the 2009 permit is to be added to this map to satify the permit requirements. A comprehensive storm system map allows for effective investigations of potential contamination sources as well as providing potential containment and outfall locations for illicit discharges in the MS4. The MS4 map must be updated accordingly as new installations, replacements, realignments, and additions (due to annexations) to the MS4 occur frequently. Once the map is completed in electronic format, updates can occur quickly and efficiently.	Required per Part III.B.3.b.	(Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices)	Yes	Engineering (Civil): Assistant City Engineer	No	As required, map is to be developed within 5 years of coverage under 2009 renewal Small MS4 General Permit (by 6/4/2014)	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of map development; information required for Map; any necessary map updates	Copy of map; supporting documentation of map developmeni progress and/or updates, as necessary
2	Development and submittal of Home Sewage Treatment Systems (HSTS) list	HSTS list	Effluent from failing HSTSs often contain pollutant concentrations that exceed established water quality standards. A number of factors can cause on-lot HSTSs to fail, including unsuitable soil conditions, improper design and installation, and inadequate maintenance practices. Identifying and eliminating failing HSTSs help control untreated wastewater discharges that contaminate ground and surface water supplies. The City Health Department maintains all HSTS records for HSTS properties in the City. Due to the availability of sanitary sewer, new applications for HSTS installations are typically denied (see "Addressing HSTSs" BMP). In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-properties within the City (by cross-checking City and County HSTS records and water and sewer utility billing records). Each property was individually checked for authenticity. All 99 HSTS-properties in the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTS" in the City). The list was submitted to Ohio EPA in 2008.	Required per Part III.B.3.c.i. Also, this allows for effective investigations of potential contamination sources of water bodies.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination" BMPs and resources (unde USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	(HSTS list previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update list as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of HSTS list and any necessary updates	Copy of list and supporting documentation, as applicable
3	Development and submittal of HSTS map	HSTS map	Based on information obtained for the required HSTS list (see "HSTS list" BMP), an HSTS map was created using GIS software. The HSTS Map was finalized and submitted to Ohio EPA in 2008. Although the requirement for the development of an HSTS map is for HSTSs connected to discharge to the City's MS4 ("off-lot HSTSs"), there are only "on-lot HSTSs" in the City of Canton. Therefore, the HSTS map only shows the locations of the "on-lot HSTSs" in Canton.	Required per Part III.B.3.c.ii. Also, this allows for effective investigations of potential contamination sources of water bodies.	"Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination" BMPs and resources (unde USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Health: Environmental Health Director	No	(HSTS map previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update map as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Progress/status of HSTS map and any necessary updates	Copy of map and supporting documentation, as applicable
4	Ordinance or other regulatory mechanism prohibiting illicit discharges into storm sewer system	Slorm water management ordinanc	Parts of Chapters 221 (Health Hazards), 223 (Private Water Systems), and 225 (Household Sewage Disposal Systems) of Title Three - Environmental Health - of the Canton City Health Code, and Part Five (General Offenses Code), Part Seven (Business Regulation Code), Part Nine (Streets, Utilities, and Public Services Code), and Part Thirteen (Building Code) of the City of Canton Codified Ordinances collectively regulate illicit discharges. However, in 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were are not addressed by existing City ordinances. Chapter 961 includes prohibitions of illicit discharges into the MS4, violations, enforcement, penalties, etc. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.	Required per Part III.B.3.d.	(Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices)	Yes	Engineering: City Engineer	No	(1) Continue to prohibit illicit discharges to MS4 through "Storm Water Management" ordinance; and  (2) ensure ordinance meets current permit requirements	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if illicit discharges to MS4 are prohibited by ordinance; and  (2) summary of any relevant revisions to ordinance	current ordinance and (2) supporting
5	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued on next page)  (continued on next page)  (continued on next page)  Addressing illicit discharges from illication ill		The City has prepared employee protocols for responses to any known or suspected illicit discharge in the MS4. These protocols include required notification of the Fire Department within 15 minutes of report or discovery of the known or suspected illicit discharge. The Fire Department also has internal protocol to follow which includes involving the HazMat Team, Collection Systems (Sewer) Department, etc., as necessary, as well as containment, cleanup, and source-tracing provisions. A report is then filed with the City Engineer who forwards to the City Service Director or other appropriate City Department, if necessary, for enforcement actions. Also, littering and illegal dumping are prohibited by Codified Ordinance Chapter 521.08 and are handled through the City Health Department. Any illicit discharges into the MS4 resulting from illegal dumping and spills are to be addressed the same way as all other illicit discharges per City protocols.	BMP assists in satifying Pari	"Illicit Discharge Detection and Elimination" and "Illegal Dumping Control" BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination)	Yes	Fire: Fire Chief  Engineering: City Engineer	No	Address illicit discharges as per established protocol and in accordance with other applicable BMPs.	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	Fire Dept to provide "Report for Illicit Discharge In MS4" to City Engineer; City Engineer to summarize # of illicit discharges identified locations, # eliminated, dates, schedules for elimination of identified illicit	responses to illici discharges

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination "Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.B.3.k. Part III.A.1.a. Part III.A.1.e. Part III.A.1.d. Part III.C. Part III.A.1.c. Part III.A.1.e Part IV.B. & C. Part III.A.1.a. Part III.A.1.a. [7] [8] [9] [10] [11] [12] [13] [3] Rationale for BMP Further Guidance Measurable Goal(s) for Information for Responsible Rationale for Information for BMP Name BMP Description Legal Agreemen BMP Permit Requirement Selection (see USEPA's Authority to Entity/ City Needed? Each Responsible Measurable Responsible Responsible Position Goal(s) Position(s) to Position(s) to National Menu of mplement? Dept(s): Document for Maintain for Stormwater BMPs Position(s) Selection Annual Reports Audits Website) (1) Summary of # ol Chapter 225 of the Canton City Health Code regulates Household Sewage Disposal Systems. Stated goals (1) Supporting "Preventing Septic (1) Continue to regulate "on-lot" and "off-lot" are easily The regulations reference Chapter 3701-29 of the Ohio Administrative Code as the minimum HSTS records System Failure" and HSTSs per Chapter 225 HSTSs within City, a compliance standard for enforcement by the City Health Department. Chapter 225 of the measurable and inspection "Illicit Discharge of the Canton City Health of HSTSs identified and/or demand Canton City Health Code also prohibits the installation, maintenance, or operation of HSTSs or documentation Detection and Code; and as illicit discharges t Provisions for property within the City provided a public sanitary sewer is within 200 feet of such property. Health: indication if and Required per Part III.B.e. and Elimination..." BMPs MS4 and addressing Household Environmental No BMP Registration of HSTS installers and sewage tank cleaners is required with the Health Addressing HSTSs 6 subsections i.-iv. and resources (unde Sewage Treatment Health Director Department. Specific maintenance requirements are also required per Chapter 225. The Healt mplementation USEPA MCM#3: (2) address HSTSs in (2) progress of Systems (HSTSs) Department has the authority to inspect HSTSs, sample the effluent, or take any other steps Illicit Discharge accordance with permit addressing HSTSs (2) supporting accordance deemed necessary to insure proper compliance with OAC 3701-29-01 to 3701-29-21. Chapter Detection and requirements Part III.B.e per permit documentation 209 of the City Health Code provides for any necessary enforcement, inspection, and penalty. with permit Elimination) and subsections i.-iv., as as applicable requirements, as expectations There are 99 "on-lot HSTSs" and no "off-lot HSTSs" in the City (See "HSTS list" BMP). applicable applicable Illicit Discharge Stated goal is Detection and easily Elimination: A measurable Guidance Manual for Dry-weather field-screening of storm water outfalls is to occur at all storm water outfalls Perform minimum of one and/or identified by the City Engineering Department via the Storm Sewer System Map created under Total # of outfalls, # Program dry-weather field demands Dry-weather field-Development and Engineering of outfalls dry-Outfall database the initial 2003 NPDES permit or as otherwise updated. An initial dry-weather screening of Dry-weather fieldscreening of all identified indication if screening of storm Required per Part III.B.3.i.iv outfalls was conducted by the City Engineering Department in 2007 in cooperation with initial Technical Yes (Civil): Assistant weather screened: and inspection screening of storm BMP outfalls during 2nd permi vater outfalls for non permit requirements. Results were tabulated in a spreadsheet. This spreadsheet is to be Assessments' City Engineer of dry-weather flows sheets water outfalls term (between 2009nplementatio storm water flows identified resource (under utilized for conducting future screenings. By performing dry-weather field-screenings, illicit 2014) is in USEPA MCM#3: discharges may be easier to detect, trace, and eliminate. accordance Illicit Discharge with permit Detection and expectations Elimination) 'Illicit Discharge Stated goals Detection and (1) Map and (1) Develop map showing 1) Progress/status of Elimination: A are easily supporting Any dry-weather flows discovered during dry-weather field-screenings of storm water outfalls creened outfalls with dry map development; Guidance Manual for measurable documentation are to be noted accordingly and further evaluated. If identified as a possible illicit discharge. Mechanisms and Mechanisms and weather flows; and and Program and/or demand and strategies to ensure existing illicit discharge protocols are to be followed (see "Illicit discharge protocols" BMP). In strategies to ensure Development and indication if addition, Codified Ordinance Part 9 regulates connections to public utilities. Permits are Engineering: City reviously dry-weather previously dry-weather Required per Part III.B.3.i.iv. No RMP Technical Yes 8 Engineer ield-screened outfalls field-screened outfalls required to be obtained from the City Engineering Department for any proposed connection to Assessments" implementation public storm or sanitary sewer. Dry-weather flow locations are to be located on a map and used will not have future will not have future illicit resource (under is in (2) Supporting (2) status of connections in conjunction with the Storm Sewer System Map as an attempt to identify sections of the MS4 (2) identify priority areas illicit connections USEPA MCM#3: accordance ddressing identified documentation to focus priorities for elimination of illicit discharges. Illicit Discharge with permit priority areas as applicable Detection and expectations Elimination) "Preventing Septic In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-System Failure" and ō properties within the City (see "HSTS list" and "HSTS map" BMPs). All 99 HSTS-properties in "Illicit Discharge the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTS" in the City). The Health Detection and Health: Department may utilize inspection reports or other data submitted or obtained from reliable BMP assists in satisfying Elimination..." BMPs Locating areas with sources to determine compliance. HSTS monitoring is typically reactive, based on odor and Locate all properties with HSTS (see "HSTS list" and "HSTS Map" BMPs) Environmental No 9 Part III.B.3.i.iv.1 and resources (under **HSTSs** Health Director risual complaints from residents or city employees. The Health Department has the authority to USEPA MCM#3: iii inspect any HSTS, sample the effluent, or take any other steps deemed necessary to insure and Illicit Discharge proper compliance with applicable portions of the Ohio Administrative Code and Canton City Detection and Detect Health Code. Elimination) 0 Stated goal is "Reducing the easily Chapters 909 and 961 of City Codified Ordinances contain provisions for required permits, fees Occurrence of SSOs' measurable and inspections for excavations within City right-of-way. Therefore, any time a person wants to and "Illicit Discharge and/or Continue to require install, connect, or modify a storm or sanitary sewer, a permit must be obtained from and the Detection and demands permits for sanitary and Indication if permits Supporting work inspected by the City Engineering Department. Suspect illicit sanitary connections to the BMP assists in satisfying Elimination..." BMPs ingineering: City indication i Monitoring sewer storm sewer installations continue to be documentation 10 BMP MS4 may arise due to complaints of foul odors or other sewage evidence in the MS4, evidence Part III.B.3.i.iv.1 and resources (under Engineer connections connections, and required as applicable of dry-weather flows, evidence of unpermitted work performed on City-owned sewers, routine USEPA MCM#3: implementation modifications Illicit Discharge MS4 inspections, etc. Upon identifying such illicit connections, illicit discharge protocols are is in followed. All illicit connections are considered priorities. Detection and accordance Elimination) with permit

expectations

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.3.) Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination "Storm Water Illicit Discharge Detection and Elimination (IDDE) Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.C. Part III.A.1.c. Part III.A.1.e. Part III.B.3.k. Part IV.B. & C. Part III.A.1.d. Part III.A.1.a. Part III.A.1.e. Part III.A.1.a. Part III.A.1.a. [11] [12] [13] [8] [9] [10] 131 [1] Rationale for BMP Further Guidance Responsible Measurable Goal(s) for Rationale for Information for Information fo Agreement Legal BMP Description BMP Name Permit Requirement BMP Each Responsible Measurable Responsible Responsible Selection (see USEPA's uthority to Entity/ City Needed? Position Goal(s) Position(s) to Position(s) to Dept(s): National Menu of mplement' Maintain for Stormwater BMPs Position(s) Selection Document for Annual Reports Audits Website) Stated goal is Sanitary sewer overflows (SSOs) are releases of raw sewage from a separate sanitary sewer easily "Reducing the system before it has reached a treatment facility. SSOs occur when the flow into the system Occurrence of SSOs" measurable exceeds the design capacity of the conveyance system, resulting in discharges into basements and "Illicit Discharge and/or Summary of footage streets, and streams. Sewage overflowing from a manhole is a common SSO, and it frequently Continue to routinely of sanitary sewers Collection demands Detection and Supporting results in untrealed sewage flowing into an MS4 or stream. SSOs can also occur due to the Resolving sanilary BMP assists in satisfying Elimination..." BMPs Systems televise sanitary sewers indication if televised, status of resence of too much inflow and inflitration (I&I) of storm water, ground water, and/or other nondocumentation 11 sewer I&I and illicit for potential I&I and BMP high I&I and/or Part III.B.3.i.iv.1. and resources (under (Sewer): as applicable sanitary flows. The City Collection Systems (Sewer) Department routinely televises sanitary connections USEPA MCM#3: Superintenden illegal/illicit connections. mplementati illegal/illicit sewer mains and checks for high levels of I&I. Areas with sanitary sewers having high levels of Illicit Discharge is in connections found I&I and/or illegal/illicit connections are considered priorities. These areas are further evaluated accordance Detection and and investigated to resolve such problems so that SSOs do not occur resulting in illicit Elimination) with permit discharges into the MS4. expectations Stated goal is on "Reducing the easily Occurrence of SSOs measurable and Upon investigation of known or suspected illicit discharges into the MS4, when the source of and/or and "Illicit Discharge the discharge is unknown and when other investigative procedures (visual inspections) are Summary of footage page Detection and Collection demands inconclusive, the Collection Systems (Sewer) Department can televise suspect sewers as an Continue to televise of storm sewers Supporting BMP assists in satisfying Elimination..." BMPs Systems indication if inspection practice to attempt to trace the source of discharges and/or verify conditions and Televising storm suspect storm sewers as elevised, status of documentation Part III.B.3.i.iv.2. and Part previous 12 BMP connectivity of lines. Using either a stick camera (stationary) or mobile sewer video camera and and resources (under (Sewer): findings (as as applicable deemed necessary III.B.6.d.iii.1. Superintendent USEPA MCM#3: nplementatio video recording equipment, the City has been televising storm and sanitary sewers since 1996. applicable) Depending on findings, certain decisions can be made if further actions are needed to reduce Illicit Discharge is in accordance Detection and floatables and other pollutants to and from the MS4. with permit Elimination) expectations Stated goal is "Reducing the Upon investigation of known or suspected illicit discharges into the MS4, when the source of Occurrence of SSOs' measurable MS4 the illicit discharge is unknown and when other investigative procedures (visual inspections) are and "Illicit Discharge Summary of locations and/or inconclusive, the City Health Department can dye test storm and sanitary sewers as an demands and dates where dye-Detection and 0 Continue to utilize dye Supporting BMP assists in satisfying Health inspection procedure to attempt to trace the source of the illicit discharges and verify Elimination..." BMPs indication if testing techniques documentation connectivity of drains to storm or sanitary sewers. In accordance with illicit discharge protocols Part III.B.3.i.iv.2. and Part Environmenta testing procedures and Sewer dye-testing 13 and resources (under BMP are being used; techniques, as necessary as applicable III.B.6.d.iii.1. Health Directo the involvement of the City Health Department to provide dye-testing is typically initiated by the summary of findings USEPA MCM#3: mplementation Fire Department or City Engineering Department. Depending on findings, certain decisions can Illicit Discharge as applicable be made if further actions are needed to reduce floatables and other pollutants to and from the accordance Detection and Elimination) with permit expectations Wa Stated goal is easily If the source of an illicit discharge into the MS4 is confirmed, the abatement of the illicit "Illicit Discharge measurable discharge requires removal of the source, and the source can be traced to a responsible party Detection and and/or Chapter 961 of Part 9 of the City Codified Ordinances provides provisions for the issuance of a Continue to adhere to Summary of location Notice of Violation to the responsible party. The Notice of Violation sets forth a deadline within Elimination ... BMPs demands illicit discharge removal where sources of Supporting Procedures for Procedures for and resources (under Engineering: City indication if Required per Part which such remediation (removal) or restoration must be completed. Said Notice further provisions within Chapter illicit discharges are documentation emoving the source of BMP removing the source advises that, should the responsible party fail to remediate (remove) or restore within the III.B.3.i.iv.3. USEPA MCM#3: Engineer 961 of the City Codified removed; dates; total as applicable illicit discharges mplementation of illicit discharges Illicit Discharge established deadline, the City has the right to perform said remediation (removal) or restoration number of removals Ordinances is in assess the costs of such work to the responsible person, party, or entity, and initiate any other Detection and accordance Elimination) legal action and administrative penalty for enforcement in accordance with the provisions of with permit Chapter 961 expectations Stated goal is 9 easily Copy of meeting "Illicit Discharge measurable Detection and and/or agenda; list of Conduct annual meeting Meeting date: It is vital to the success of this MCM that the City's Storm Water IDDE Program is routinely attendees: Elimination..." BMPs demands with key personnel to Procedures for supporting Storm Water IDDE indication if personnel in Required per Part and resources (under ngineering: City evaluated and assessed by appropriate personnel and modified accordingly as needed. Key evaluate and assess No program/plan **BMP** 15 rogram evaluation and departments involved in this BMP are Engineering, Collection Systems (Sewer), Fire USEPA MCM#3: Engineer attendance: relevant documentation of III.B.3.i.iv.4 IDDE Program; revise evaluation and assessment IDDE Program Illicit Discharge nplementation revisions Department, and Health assessment IDDE Program as needed revisions, as Detection and is in Elimination) accordance applicable with permit expectations

				CITY OF CANTON, OHIO: NPDES PHASE I	I STORM WATE	ER MANAGI	EMENT	PROGRA	M (SWN	MP)			
				(Permit Part III.B.3.) Minimum Control Meas	the state of the s		etection a	nd Eliminat	ion				
"Stor	m Water I	Ilicit Discharge De	etection and Elimin	ation (IDDE) Program": Best Management Practices (BMPs)/Requirements i		quirements	TE	I		1	1-2		I 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
[1] BMP #	Perm	[2] ift Requirement	Part III.A.1.a. [3] BMP Name	Part III.A.1.a. [4] BMP Description	Part III.A.1.a. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.e. [7] Legal Authority to Implement?	Part III.A.1.d. [8] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [9] Agreement Needed?	Part III.A.1.c. [10] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [11] Rationale for Measurable Goal(s) Selection	Part III.B.3.k. [12] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C.  [13] Information for Responsible Position(s) to Maintain for Audits
16	Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4 (continued from previous page)	Addressing certain categories of non- storm water discharges/ flows dentified as significant contributors of pollutants to MS4	Addressing non-slorm water discharges identified as significant contributors of pollutants to MS4	The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to be a significant contributor of pollutants to the MS4, the City of Canton is to address such discharges as illicit discharges in accordance with illicit discharge protocol.	Required per Part III.B.3.g.	"Illicit Discharge Detection and Elimination" BMPs and resources (unde USEPA MCM#3: Illicit Discharge Detection and Elimination)		Engineering: City Engineer	No	Identify such discharges and evaluate whether they should be addressed as illicit discharges, as necessary	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Types of such discharges to be addressed as illicit discharges, as necessary	Supporting documentation, as applicable
17	businesse of haza illegal dis	public employees, es, and general public ands associated with charges and improper sposal of waste	Illegal discharge and trash management education	This requirement is addressed under MCM #1. See "Illegal discharge and trash mar	nagement education" and "Go	vernment employee tra	aining/ educatio	n to prevent and r	educe storm w	rater pollution from municip	al operations" BM	Ps under MCM #1 for	details.
18	occassi storm wa	elopment of list of ional incidental non- ater discharges <u>not</u> to ddressed as illicit discharges	List of non-storm water discharges not to be addressed as illicit discharges	The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to not be a significant contributor of pollutants to the MS4, the City of Canton is not to address such discharges as illicit discharges. The City Engineer is to maintain a list of such "allowable" non-storm water discharges. Due to the nature of this BMP, such list will be continually evolving, as necessary.		"Illicit Discharge Detection and Elimination" BMP and resources (unde USEPA MCM#3: Illicit Discharge Detection and Elimination)		Engineering: City Engineer	/ No	Maintain a list of such "allowable" discharges, as necessary.	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Descriptions of "allowable" non- storm water discharges, as applicable	List and supporting documentation, as applicable

	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revise
	(Permit Part III.B.4.) Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control	
CM Permit Require	ment(s)	4
Part III.B.4.a.	[City of Canton] shall develop, implement, and enforce a program to reduce pollutants in any storm water discharges from construction activities that result in land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in [City of Canton's] program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If Ohio EPA waives requirements for storm water discharges associated with construction from a specific site. [City of Canton] is not required to enforce its program to reduce pollutant discharges from such site(s). [City of Canton's program shall include the development and implementation of, at a minimum:	
Part III.B.4.a.i.	An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio NPDES General Storm Water Permit(s) for Construction Activities applicable to [City of Canton's] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHCD00001, and OHCD00001. If [City of Canton] initially had coverage under a previous version of this permit [City of Canton's] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this permit was granted [6/4/09];	
Part III.B.4.a.ii.	Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;	
Part III.B.4.a.iii.	Requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the contruction site that may cause adverse impacts to water quality;	<u> </u>
Part III.B.4.a.iv.	Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;	4
Part III.B.4.a.v.	Procedures for receipt and consideration of Information submitted by the public; and	4
	Procedures for site inspection and enforcement of control measures.	
saining Process /	Rationale Statement) for Development of Construction Site Storm Water Control Program	
Part III.B.4.b.	[City of Canton] shall document [its] decision process for the development of a construction site storm water control program. [City of Canton's] rationale statement shall address both [City of Canton's] overall contraction site storm water control program and the individual BMPs, measurable	
Response:	The City of Canton supports EPA's assessment that polluted stormwater runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams. Pollutants commonly discharged from construction sites include: sediment, solid and sanitary wastes, phosphorous (fertilizer), nitrogen (fertilizer), pesticides, oil and grease, concrete truck washout, construction chemicals, and construction debris. The resulting of pollutants from construction sites can cause physical, chemical, and biological harm to our nation's waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <a href="http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm">http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm</a> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.  The City of Canton is to implement the BMPs described below as part of its Construction Site Storm Water Runoff Control Program to reduce pollutants in stormwater runoff to its MS4 from construction activities that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Construction Site Stormwater Runoff Control" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.	1/21/201
Part III.B.4.b.	The self-pools of statement is hall include the following information, at a minimum:	
Part III.B.4.b.i.	The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to require erosion and sediment controls at contruction sites and why [City of Canton] needs to develop this mechanism, describe [City of Canton's] plan and a sediment controls at controls at controls of the relevant sections with [City of Canton] needs to develop this mechanism, describe [City of Canton's] plan and a sediment controls at controls of the relevant sections with [City of Canton] needs to develop this mechanism, describe [City of Canton's] plan and a sediment controls at controls at controls of the relevant sections with [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton] needs to develop this mechanism. If [City of Canton] needs to develop this mechanism needs to develop this needs to dev	
Response	The City of Canton is to utilize an ordinance as the regulatory mechanism to require erosion and sediment controls at construction sites. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize an ordinance as the regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to other city of Canton is to utilize to other city of Canton is to utilize an ordinance as the regulations and to establish local law. Prior to 2009, older City of Canton is to utilize to other city of Canton is to utilize an ordinance as the regulation is to utilize an ordinance as the regulation is to utilize to other city of the regulation is to utilize to other city of the regulation is to utilize to other city of the regulation is to utilize to other city of the regulation is to utilize to other city	1/21/20
Part III.B.4.b.ii.	[City of Canton's] plan to ensure compliance with [its] erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms [City of Canton] will use to ensure compliance. Describe [City of Canton's] procedures for when [City of Canton] will use certain and on procedure constitute and procedure constitute constitution constitute constitution constitute constitution	
Response	The City of Canton's "Storm Water Management Ordinance" includes sanctions and enforcement mechanisms to ensure compliance. The ordinance provides for plan denials, Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. See "SWP3 reviews" and "Construction site inspections and enforcement" BMPs below for further details.	1/21/20
Part III.B.4.b.iii.	[City of Canton's] requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes, but is not limited to, discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;	<u> </u>
Response	The City of Canton requires construction site operators to implement appropriate erosion and sediment control BMPs and control waste (discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste, etc.) at construction sites that may cause adverse impacts to water quality. See "Construction site storm water runoff quality controls" BMP below for further details.	1/21/20
Part III.B.4.b.iv.	[City of Canton's] procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts.	
Response	Through a Memorandum Of Understanding between the City of Canton and the Stark SWCD, procedures for pre-construction SWP3 reviews which incorporate consideration of potential water quality impacts are established. 100% of applicable proposed land disturbance activities are required to have SWP3s submitted, reviewed, and approved prior to construction activities taking place. The number of overall annual site plan reviews is difficult to estimate since it is highly dependent on the development economy. See "SWP3 reviews" BMP below for further details.	1/21/20
Part III.B.4.b.v.	[City of Canton's] procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with [City of Canton's] public education program;	4/04/00
Response	The City of Canton has established procedures for the consideration of information submitted by the public. See "Procedures for receipt and consideration of information submitted by public" BMP below for further details.	1/21/20
Part III.B.4.b.vi.	[City of Canton's] procedures for site inspection and enforcement of control measures, including how [City of Canton] will prioritize sites for inspection;	4/04/00
Response	The City of Canton has established procedures for site inspection and enforcement of control measures, including how sites are prioritized for inspection. See "Construction site inspections and enforcement" BMP below for further details.	1/21/20
Part III.B.4.b.vii. Response	Who is responsible for overall management and implementation of [City of Canton's] construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program; and  Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's construction site storm water control program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/20
Part III.B.4.b.viii.	The second secon	
Response	the management and the MCM by determining if the management and the MCM by determining the MCM	OI I
Performance Stan	dards	
Part III.B.4.c.	[City of Canton's] construction site storm water control program shall include pre-construction storm water pollution prevention plan review of all projects from contruction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable [City of Canton's] construction site storm water control program shall include pre-construction storm water pollution prevention plan review of all projects from contruction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable sites shall be initially inspected. The frequency of follow-up inspections shall be on a monthly basis unless [City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] program to satisfy these performance standards, if needed, within two years of when coverage under the current general permit was granted [6/4/09].	<i></i>
Annual Reporting		
Part III.B.4.d.	Annual Reports shall document the following: (1) number of applicable sites in jurisdiction, (2) number of enforcement actions taken, and (6) number of complaints received and number followed up on.	

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Permit Part III.B.4.) Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control "Construction Site Storm Water Control Program": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.B.4.d. Part IV.B. & C. Part III.A.1.c. Part III A 1 e Part III.A.1.a. Part III.A.1.e. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.a. [6] [7] [8] [9] [10] [11] [12] [13] [1] [2] [3] Rationale for BMP Further Guidance Responsible Measurable Goal(s) for Rationale for Information for Information for Legal BMP Name **BMP Description** BMP Permit Selection (see USEPA's Authority to Entity/ City Needed? Each Responsible Position Measurable Responsible Position(s) Responsible Requirement to Document for Annual National Menu of Dept(s): Goal(s) Position(s) to Implement? Position(s) Selection Reports Maintain for Stormwater BMP Audits Website) (1) Continue to use Stated goals In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities ordinance to require are easily (1) Indication if respective (1) Copy of Local Ordinances for Ordinance or construction site storm water measurable controls are required by current ordinance and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy Construction Site other regulatory permit requirements that were are not addressed by existing City ordinances. A "City of Canton Storm Water runoff quality controls on and/or demand ordinance; and and Runoff Control\* mechanism applicable sites; and indication if Management Manual" was adopted as part of the ordinance and includes provisions for the required Storm water (under USEPA Engineering: City requiring BMP Required per Part III.B.4.a.i No construction site storm water runoff quality controls for applicable sites. The ordinance requires, at a minimum, management MCM#4: Engineer (2) indication if ordinance construction site the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 lementatio ordinance Construction Site is in conformance with (2) ensure ordinance meets erosion. as well as requirements in the Stark SWCD's Storm Water Quality Regulations. Appropriate sanctions to is in (2) supporting Stormwater Runoff current applicable NPDES minimum requirements of sediment, and ensure compliance are also provided. Refer to Chapter 961 "Storm Water Management" ordinance and the accordance documentation Control) current applicable NPDES permits; summary of any waste controls with permit "City of Canton Storm Water Management Manual" for further details. as necessary permits relevant revisions to expectations ordinance Stated goal is easily (Refer to all measurable As described in the "Ordinance requiring construction site storm water runoff quality controls" BMP, the "City of Canton Storm Water Management Manual" requires, at a minimum, the minimum requirements of Ohio EPA's Construction Site and/or Indication if construction Ensure construction site Requirements for Stormwater Runoff demands site erosion, sediment, and Construction General Storm Water Permit for Construction Activities: OHC000003 for construction site storm water runoff erosion, sediment, and waste construction site Required per Part III.B.4.a.ii-Control BMPs on indication if waste controls are Copy of curren quality controls, including erosion, sediment, and waste control. These requirements are to be applicable to Engineering: City sile storm water controls are implemented in erosion USEPA's National **BMP** implemented in sites in which there is proposed to be 1 acre or more of land disturbance as well as to sites in which there is Engineer ordinance runoff quality accordance with current sediment, and proposed to be less than 1 acre of land disturbance but part of a larger common plan of development that will Menu of Best plementation accordance with current controls applicable NPDES permits waste control Management applicable NPDES permits is in disturb 1 acre or more of land. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Practices) accordance Canton Storm Water Management Manual" for further details. with permit expectations Stated goals (1) Copy of MOI (1) Renew MOU between (1) Indication of MOU are easily City and Stark SWCD Procedures for and payment renewal: and measurable Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes Storm Water annually; and verification; and "Construction Phase and/or demand the role of Stark SWCD in reviewing applicable sites for compliance with Ohio EPA's General Storm Water Pollution Plan Review" (under Permit for Construction Activities: OHC000003 and Stark SWCD's Storm Water Quality Regulations. This Stark SWCD: (2) ensure SWP3s are indication if (2) indication if SWP3s are Prevention Plan USEPA MCM#4 (2),(3) SWP3 Required per Part III.B.4.a.iv. Yes **BMP** Urban Resource SWP3 reviews includes reviewing plans for storm water quality management of both construction site runoff and postdeveloped and submitted for developed and submitted (SWP3) review Construction Site review files and construction runoff. As such, no applicable site plan is approved without SWP3s being first approved by Stark Coordinator mplementation applicable sites; and for applicable sites; and which incorporate Stormwater Runoff supporting SWCD. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water is in consideration of Control) (3) continue to utilize Stark (3) # of applicable sites in documentation. Management Manual" for further details. accordance potential water SWCD to review applicable jurisdiction; # of SWP3s as applicable; an with permit quality impacts SWP3s reviewed expectations (1) Renew MOU between (1) Copy of MOU (1) Indication of MOU Stated goals City and Stark SWCD and payment The public is welcomed to attend regular City Council meetings, contact the City Building Department, any other are easily renewal: and verification; and annually; and "Municipal measurable department, or the Stark SWCD (330-830-7700 ext. 5) as necessary to relay questions and concerns about (2) continue to receive and Construction Procedures for Procedures for current or proposed construction activities within the City. The City does its best to answer questions and nd/or demand (2) # of construction consider information nspection Program receipt and receipt and Stark SWCD: indication if activity complaints (2),(3) supporting consider information submitted by the public. Since 2007, the City and Stark SWCD have an active (under USEPA submitted by public, as onsideration of consideration o Required per Part III.B.4.a.v. Urban Resource Yes **BMP** received; and documentation Memorandum of Understanding (MOU) which describes the role of Stark SWCD in addressing public 4 MCM#4 applicable: and information information omplaints pertaining to MCM 4 & 5 by site investigation, letter, or phone call. Most of the information submitted Coordinator nolementation describing date Construction Site submitted by submitted by by the public relating to construction activities is in regards to construction complaints, so the Stark SWCD is (3) continue to investigate is in location, issue, Stormwater Runof (3) # of construction public public typically the entity that is involved in addressing the respective information. If Stark SWCD is unable to address and follow-up on applicable accordance actions taken, Control) clivity complaints followe with permit the issue, the appropriate City representative becomes involved. construction activity etc., as applicab up on complaints expectations 'Municipal Stated goals (1) Renew MOU between (1) Copy of MOL Construction (1) Indication of MOU Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes are easily City and Stark SWCD and payment Inspection Program the role of Stark SWCD in regularly inspecting all applicable sites for implementation of appropriate measurable renewal: and annually; and verification; and construction site and post-construction storm water quality BMPs as well as sending copies of all inspection and "Local and/or demand Procedures for Construction (2) continue to inspect reports to the City of Canton and reporting all non-compliant sites for appropriate enforcement actions by the (2) copies of site Ordinances for Stark SWCD: indication if site inspection 2) # and frequency of site site inspection Required per Part III.B.4.a.vi. applicable construction sites inspection letters City via Chapter 961 "Storm Water Management" of the City Codified Ordinances. All applicable activites are Construction Site Urban Resource Yes BMP 5 and enforcemen inspections; and and considered priorities until a Notice Of Termination is filed with Ohio EPA and therefore all such sites are Runoff Control" Coordinator plementation and of control enforcement (under USEPA is in (3) copies of inspected regularly. Chapter 961 contains all necessary inspection, enforcement, and penalty provisions measures (3) notify City of Canton for (3) # of violation letters necessary to satisfy the permit requirements. Refer to Chapter 961 "Storm Water Management" ordinance and MCM#4 accordance notifications to enforcement of violations, as issued and corresponding the "City of Canton Storm Water Management Manual" for further details. Construction Site with permit City, as applicable status

Stormwater Runof

expectations

applicable

	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revise
	(Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment	
CM Permit Requi	rement(s)	
Part III.B.5.a.	[City of Canton] shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment or sale, that discharge into its MS4. [City of Canton's] program shall ensure that controls are in place that will prevent or minimize water quality impacts;	
Part III.B.5.b.	[City of Canton] shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for [City of Canton].  [City of Canton] shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent projects to the extent projects or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to the extent projects or local law. [City of Canton's] ordinance or other regulatory mechanism to address post-construction runoff from new development projects to	
Part III.B.5.c.	equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit(s) for Construction Activities applicable for [City of Canton] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHCD000001, and OHCD000001. [Since City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this general permit was granted [6/4/09].	
Part III.B.5.d.	[City of Canton] shall ensure adequate long-term operation and maintenance of BMPs.	-:-
	Rationale Statement) for Development of Post-Construction SWMP	
Part III.B.5.e.	[City of Canton] shall document [its] decision process for the development of a post-construction SWMP. [City of Canton's] rationale statement shall address both [its] overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for [City of Canton's]	
Response	: The City of Canton supports EPA's assessment that post-construction stormwater management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving waterbodies. See USEPA's Stormwater Phase II Final Rule Fact  Shoot Series at http://cfp.ub.epa.gov/ppdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.	
	The City of Canton is to implement the BMPs described below as part of its Post-Construction Storm Water Management Program to reduce pollutants in post-construction runoff to its MS4 from new development and redevelopment projects that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Post-Construction Stormwater Management in New Development and Redevelopment" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.	1/21/20
Part III.B.5.e.	The rationale statement shall include the following information, at a minimum:	
Part III.B.5.e.i.	[City of Canton's] program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.	
Response	The City of Canton is to implement the requirements of this MCM so that both the post-construction quantity and quality of storm water runoff from new development and redevelopment projects is appropriately managed. Post-construction storm water quality management is to apply to all sites disturbing 1 acre or more while post-construction storm water quantity management is to be evaluated and applied accordingly to all sites requiring the submission of a site plan per the Planning and Zoning Code. Detailed standards, specifications, and requirements for post-construction storm water quantity and quality management are to be provided via "Storm water management ordinance" BMP below.	1/21/20
Part III.B.5.e.ii.	How [City of Canton's] program will be specifically tailored for [City of Canton's] local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.	
Response	Until further regulation is mandated by the EPA requiring specific BMPs or controls for specific pollutants, the City of Canton belives that by implementing the requirements of this MCM, the City's program is tailored for the local community. Through the use of applicable local master plans, comprehensive plans, zoning ordinances, the involvement of the Stark SWCD in plan review and site inspections, local storm water management requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003, and discretion by City and SWCD staff for non-standard circumstances, improved post-construction water quality is promoted in many ways thus attempting to minimize water quality impacts and maintain pre-development runoff conditions.	1/21/20
Part III.B.5.e.iii.	Any non-structural BMPs in [City of Canton's] program, including, as appropriate: policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventative maintenance, and spill prevention.	a
Respons	e The City of Canton implements various non-structural BMPs that meet the above descriptions. See all non-structural BMPs and strategies below for further details.	1/21/20
Part III.B.5.e.iv.	Any structural BMPs in [City of Canton's] program, including, as appropriate: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bioretention cells, sand filters, and filter strips; and infiltration practices such as infiltration basins and infiltration trenches.	4.4.1
Respons	e: The "City of Canton Storm Water Management Manual" (part of the City's "Storm Water Management" ordinance) contains provisions for structural BMPs in accordance with requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. See all structural BMPs and strategies below for further details.	1/21/20
Part III.B.5.e,v.	The mechanism (ordinance or other regulatory mechanisms) [City of Canton] will use to address post-construction runoff from new developments and why [City of Canton] chose the mechanism(s). If [City of Canton] needs to develop a mechanism, describe in [City of Canton's] plan and a schedule to do so. If [City of Canton's] ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.	
Respons	e: The City of Canton is to utilize an ordinance as the regulatory mechanism to address post-construction runoff from new developments and redevelopments. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" BMP below for further details.	1/21/20
Part III.B.5.e.vi.	How [City of Canton] will ensure long-term operation and maintenance (O&M) of [its] selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between [City of Canton] and another party such as the post-development landowners or regional authorities.	
Respons	e: The City of Canton is to require Long Term Maintenance Plans to be developed for applicable post-construction BMPs and ensure easement requirements and inspection and enforcement provisions are provided within its "Storm Water Management" ordinance to help ensure that long-term operation and maintenance occurs as appropriate. See "Long Term Maintenance Plans" BMP below for further details.	1/21/20
Part III.B.5.e.vii.	Who is responsible for overall management and implementation of [City of Canton's] post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.	
Respons	Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's post-construction SWMP.  However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/20
Part III.B.5.e.viii.	How [City of Canton's] program will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.	<u> </u>
Respons	In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully	/or <b> </b> 1/21/20
erformance Star	idards	
Part III.B.5.f,	[City of Canton's] post-construction SWMP shall include pre-construction storm water pollution prevention plan reviews of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable such than or equal to one acre to ensure that required controls are designed per requirements. [City of Canton's] post-construction SWMP shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements are in place for all applicable sites [Since the City of Canton] initially had coverage under the current general permit was granted [6/4/09].	
Annual Reporting  Part III.B,5.g.	Annual Reports shall document the following: (1) number of applicable sites in jurisdiction requiring post-construction practices were built as per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.	s

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment "Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.c. Part III.A.1.e. Part III.B.5.q. Part IV.B. & C. Part III.A.1.e. Part III.A.1.a. Part III.A.1.a. [9] [11] [12] [13] [1] Rationale for BMP Further Guidance Legal Responsible Agreemen Measurable Goal(s) for Rationale for Information for Information for BMP Description BMP BMP Name Permit Requirement Each Responsible (see USEPA's Needed? Measurable Responsible Entity/ City Responsible Selection Authority to National Menu of Implement? Dept(s): Position Goal(s) Position(s) to Position(s) to Selection Document for Maintain for Stormwater BMPs Position(s) Website) Annual Reports Audits (1) Continue to use ordinance to require (1) Indication if Stated goals (1) Copy of In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine construction site storm respective controls Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within 'Ordinances for Postare easily rrent ordinance water runoff quality are required by Construction Runoff measurable and existing ordinances and satisfy permit requirements that were are not addressed by existing City controls on applicable ordinance; and (under USEPA and/or demand ordinances. A "City of Canton Storm Water Management Manual" was adopted as part of the sites: and Ordinance or Other Regulatory MCM#5: Postordinance and includes provisions for the required controls for post-construction runoff from indication if Storm water ngineering: City (2) indication if Mechanism Requiring Controls for Post-Required per Part III.B.5.c. applicable new development and redevelopment sites. The ordinance requires, at a minimum, Construction RMP management Engineer ordinance is in Construction Runoff from New implementation Stormwaler the minimum requirements of Ohio EPA's General Storm Water Permit for Construction (2) ensure ordinance ordinance conformance with Development and Redevelopment Activities: OHC000003 as well as requirements in the Stark SWCD's Storm Water Quality Management in New meets minimum is in (2) supporting current applicable Development and accordance Regulations. Appropriate sanctions to ensure compliance are also provided. Refer to Chapter requirements of current documentation NPDES permits; 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Redevelopment) applicable NPDES with permit as necessary summary of any expectations Manual" for further details permits elevant revisions to ordinance The City's Planning & Zoning Code regulates development within all areas of the City in (1) Indication if "Ordinances for Post-(1) Continue to regulate Stated goals accordance with respective zone classifications. Chapter 1132 regulates the "Flood Hazard described "non-(1) Copy of District" which generally restricts development adjacent to certain water bodies within the City. Construction Runoff' 'non-structural" measures are easily tructural" measures current "Development as described through measurable Chapter 1133 regulates the "Open Space District" which reserves such areas for public parks continue to be ordinances; and and recreation, and promotes the conservation of natural resources including land and water Districts", and other zoning ordinances; and and/or demand regulated; and BMPs (under USEPA Building indication if conservation and wildlife refuges, and agricultural areas. BMP assists in satisfying Zoning provide of soils MCM#5: Post-Yes Zoning): Zoning No BMP 2 9 ! pue Part III.B.5.e.iii. ordinances Construction implementation Inspector Other chapters regulate residential, business, and industrial districts, with certain requirements (2) investigate the 2) progress/status o Stormwater is in for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as (2) supporting implementation of implementation of Management in New accordance applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impac additional related "nonny additional related Poli documentation. with permit Development and development" philosophy such as the preservation and utilization of natural topography, geologic as applicable structural" measures, as "non-structural" Redevelopment) expectations features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, applicable measures E preventing the disruption of natural drainage patterns, etc. Stated goal is The City does not have a specific "dedicated funding source for open space acquisition" "Protection of Natura easily Features", "Open measurable However, the City of Canton funds a Parks Department. The mission statement of the Canton ы Board of Park Commissioners states that the Board "is committed to maintaining and conserving Space Design", and and/or Investigate opportunities Progress/status of diverse park, recreation, and open space opportunities by providing safe, adaptable, and other BMPs (under demands to acquire open spaces Supporting Parks USEPA MCM#5: BMP assists in satisfying indication if any open space environmentally conscious park areas". The Parks Department's natural function is to ensure Park: Director and develop or preserve documentation. Stra Department that all City-owned properties under the responsibility of the Parks Department are in Part III.B.5.e.iii Post-Construction **BMP** acquisitions or as parks or other similar as applicable funding nplementation preservation es and ordinances tha sensitive areas such a a dedicated funding so Stormwater onformance with the mission statement. As funds and opportunities allow, open spaces can be land use designations Management in New is in acquired by the Park Board and developed or preserved as parks or other similar land use **BMPs** accordance Development and designations. Additional information can be found on the City's website at Redevelopment) with permit www.cantonohio.gov/parks. expectations Stated goal is "Protection of Natural The City does not have a specific "dedicated funding source for open space acquisition" easily However, the City Development Department administers Community Development Block Grant Features", "Open measurable Progress/status of Space Design", and Investigate opportunities (CDBG) funds. These funds are provided annually through federal programs and are intended to and/or itilizing CDBG funds be used to serve low and moderate income areas within the City. Certain criteria must be met to other BMPs (under to utilize CDBG funds to demands to acquire and Supporting Community BMP assists in satisfying USEPA MCM#5: Development: acquire and preserve indication if utilize CDBG funds. Each CDBG funding opportunity is evaluated case-by-case. It is possible Yes preserve open documentation Development Part III.B.5.e.iii. Post-Construction Director open spaces or develop BMP that certain CDBG funded projects may provide for the acquisition and preservation of open spaces or develop as applicable Block Grants them into recreational Stormwater plementation spaces and green spaces or for the acquisition and development of of open spaces into active nem into recreationa Management in New areas, as applicable is in recreation areas. Additional information can be found on the City's website at areas, as applicable cantonohio.gov/development or by contacting the Development Department at 330-489accordance Development and Redevelopment) with permit expectations

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment "Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part IV.B. & C. Part III.A.1.c. Part III.A.1.e. Part III.B.5.g. Part III.A.1.e. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.a. Part III.A.1.a. [12] [8] [9] [10] [11] [13] 131 Further Guidance Measurable Goal(s) for Rationale for Information for Information for Rationale for BMP Responsible BMP Name BMP Description Legal Agreemen BMP Permit Requirement Selection (see USEPA's Authority to Entity/ City Needed? Each Responsible Measurable Responsible Responsible Position(s) to Position(s) to Position Goal(s) National Menu of molement Dept(s): Position(s) Selection Document for Maintain for Stormwater BMPs Annual Reports Audits Website) Stated goal is The City does not have a specific "dedicated funding source for open space acquisition". However, funding opportunities from sources such as the Clean Ohio Green Space Conservation Protection of Natural easily Features", "Open measurable Program help to fund the preservation of open spaces, sensitive ecological areas, and stream Investigate opportunities Progress/status of Space Design", and and/or corridors. Among other purposes, the Clean Ohio Green Space Conservation Program provides to utilize Clean Ohio utilizing Clean Ohio other BMPs (under demands Clean Ohio Funds to projects that specifically: preserve streamside forests, natural stream Clean Ohio Funds, etc. to acquire and funds to acquire and Supporting indication if USEPA MCM#5: BMP assists in satisfying Engineering: City Green Space channels, functioning floodplains, and other natural features of Ohio's waterways; support preserve open spaces or preserve open documentation Yes 5 Part III.B.5.e.iii. Post-Construction Engineer BMP comprehensive open space planning; secure easements to protect stream corridors, etc. Conservation spaces or develop as applicable develop them into nolementation Additional information can be found on the Clean Ohio Fund website at Stormwater Program, etc. em into recreationa recreational areas, as is in www.clean.ohio.gov/GreenSpaceConservation. When appropriate, the City applies for and Management in New applicable areas, as applicable accordance Development and sometimes is awarded Clean Ohio Funds and/or other funds/grants for various projects and different applications. The City of Canton has utilized and hopes to continue to utilize these types Redevelopment) with permit expectations of funds for such purposes. "Low Impact In 2005, the Canton City Planning Commission initiated an amendment to the Canton City Stated goal is Development (LID) Zoning Ordinance (Ordinance #217-2005) which allows for infill residential development. The easily and Other Green measurable ordinance provides that lots created prior to 1979 and held in separate ownership from adjoining Design Strategies", Supporting and/or and/or abutting property and less than the required lot area and width requirements of the As applicable, any policies or lummary of any infill documentation "Development applicable zoning district shall be deemed buildable lots if all of the following apply: the lot Continue to encourage demands ordinances that encourage infill development summarizing Districts", and other Infill residentia infill residential indication if BMP assists in satisfying Development frontage is not less than 45 feet; the total area of the lot is not less than 4,500 square feet; and development in higher density BMPs (under USEPA Yes No occurring in location(s) of 6 development over 65% of the properties within 300 feet of the same street frontage of the lot are the same or BMP Part III.B.5.e.iii. Director development via urban areas and areas with accordance with applicable infill MCM#5: Postordinance ordinance implementation less than the lot in question and are developed with a permitted residential structure. Any lot not existing storm sewer Construction ordinance development, as is in meeting current zoning requirements for the district in which it is located and not meeting the infrastructure applicable Stormwater accordance equirements of the ordinance are deemed non-buildable unless granted a variance by the Board Management in New with permit of Zoning Appeals. Most City streets serving higher density urban areas have existing storm Development and expectations sewers. Redevelopment) As applicable, any education Storm water programs for developers and the education for This requirement is addressed under MCM #1. See "Storm water education for development community" BMP under MCM #1 for details. public about project designs that development minimize water quality impacts community The City's Planning & Zoning Code regulates various aspects of development within all areas of (1) Indication if "Low Impact Stated goals (1) Continue to regulate the City in accordance with respective zone classifications. Chapter 1132 regulates the "Flood (1) Copy of described "non-Development (LID) 'non-structural" measures are easily Hazard District" which generally restricts development adjacent to certain water bodies within the and Other Green tructural" measure: current as described through measurable City, Chapter 1133 regulates the "Open Space District" which reserves such areas for public Design Strategies". continue to be ordinances; and As applicable, any measures to zoning ordinances; and and/or demand parks and recreation, and promotes the conservation of natural resources including land and "Smart Growth", and regulated; and minimize the percentage of Building indication if water conservation and wildlife refuges, and agricultural areas. other BMPs (under BMP assists in satisfying impervious area after Zoning Zoning): Zoning BMP 8 S Part III.B.5.e.iii USEPA MCM#5: development and that minimize ordinances mplementation Other chapters regulate residential, business, and industrial districts, with certain requirements Inspector Post-Construction 2) progress/status of (2) investigate the directly connected impervious is in for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as Stormwater implementation of implementation of (2) supporting areas accordance applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impac Management in New additional related "nonany additional related documentation with permit development" philosophy such as the preservation and utilization of natural topography, geologic Development and structural" measures, as "non-structural" as applicable expectations features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, Redevelopment) applicable measures preventing the disruption of natural drainage patterns, etc. (1) Continue to require Stated goals (1) Indication of adherance to Ohio EPA's are easily required adherance "BMP Inspection and General Storm Water (1) Copy of measurable to respective Ohio The City of Canton believes that such "source control measures" are addressed as necessary by Maintenance" (under Permit for Construction ordinance; and EPA Permit for and/or demand As applicable, any source Storm Water Pollution Prevention Plans via the requirements of Ohio EPA's General Storm USEPA MCM#5: Activities for applicable indication if applicable sites; and control measures thought of as Required per Part III.B.5.e.iii Post-Construction Engineering: City sites: and Water Permit for Construction Activities as well as the required Long Term Maintenance Plans Source control Yes No 9 good housekeeping. Stormwater Engineer (see "Long Term Maintenance Plans" BMP) on applicable sites. As long as the minimum as applicable measures (2) investigate the implementation 2) progress/status of preventative maintenance, and requirements within Ohio EPA's General Storm Water Permit for Construction Activities are met Management in Nev is in (2) supporting implementation of implementation of spill prevention Development and such source control measures should be implemented as necessary on applicable sites. accordance additional related "nonany additional related documentation, Redevelopment) structural" measures, as with permi as applicable "non-structural" expectations applicable measures

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.5.) Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment "Post-Construction Storm Water Management Program (SWMP)": Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.A.1.e. Part III.B.5.g. Part IV.B. & C. Part III.A.1.e. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.c. Part III.A.1.a. Part III.A.1.a. [8] [9] [11] [12] [13] [3] Further Guidance Measurable Goal(s) for Rationale for Information for Information for Rationale for BMP Responsible BMP Description Legal Agreemen **BMP Name** BMP Permit Requirement Selection (see USEPA's Authority to Entity/ City Needed? Each Responsible Measurable Responsible Responsible Position(s) to Position(s) to Position Goal(s) National Menu of mplement? Dept(s): Selection Document for Maintain for Stormwater BMPs Position(s) Annual Reports Audits Website (1) Continue to require Stated goals (1) Indication of "Wet Ponds" and adherance to Ohio EPA's equired adherance are easily Such practices are listed as available options to satisfy post-construction "structural" water General Storm Water (1) Copy of other retention/ measurable to respective Ohio quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. 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Such USEPA MCM#5: (2) ensure SWP3s are SWP3s are Procedures for Storm, 'Mater Pollution Slark SWCD: indication if Post-Construction developed and submitted (2),(3) SWP3 developed and procedures also ensure that Storm Water Quality Regulations. This includes reviewing plans for storm water quality Prevention Plan (SWP3) revie," which Urban Resource BMP SWP3 reviews management of both construction site runoff and post-construction runoff. As such, no applicable post-construction controls are Stormwater for applicable sites; and submitted for review files and incorporate consideration of potential Coordinator implementation Management in New applicable sites; and supporting site plan is approved without SWP3s being first approved by Stark SWCD. Refer to Chapter 961 designed per requirements water quality impacts is in "Storm Water Management" ordinance and the "City of Canton Storm Water Management for applicable sites. Development and documentation accordance Redevelopment) (3) continue to utilize (3) # of applicable as applicable; and Manual" for further details with permit Stark SWCD to review ites in jurisdiction; # expectations applicable SWP3s of SWP3s reviewed (1) Renew MOU between Stated goals (1) Copy of MOU I) Indication of MOU City and Stark SWCD are easily and payment "BMP Inspection and renewal; and Construction site inspections annually; and measurable verification; and Maintenance" (under Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) are required per MCM#4. and/or demand which describes the role of Stark SWCD in inspecting applicable sites for implementation of USEPA MCM#5: (2) continue to inspect (2) # and frequency (2) copies of site Stark SWCD: Construction Such inspections also ensure indication if appropriate construction site and post-construction storm water quality BMPs as well as sending Post-Construction applicable construction of site inspections; nspection letters: Yes Jrban Resource Yes BMP Procedures for site inspection and that post-construction copies of all inspection reports to the City of Canton and reporting all non-compliant sites for Stormwater siles; and and and Coordinator implementation enforcement of control measures controls are installed per appropriate enforcement actions by the City (via the Planning and Zoning Code and/or other Management in New enforcement requirements for applicable is in (3) copies of ordinance). Site inspections are required per MCM#4. Development and (3) notify City of Canton (3) # of violation accordance sites notifications to Redevelopment) for enforcement of letters issued and with permit City, as violations, as applicable corresponding status expectations applicable

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	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.	4	Part III.A.1.b.		Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.5.g.	Part IV.B. & C.
[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] Responsible Entity/ City Dept(s); Position(s)	[9] Agreement Needed?	[10] Measurable Goal(s) for Each Responsible Position	[11] Rationale for Measurable Goal(s) Selection	[12] Information for Responsible Position(s) to Document for Annual Reports	[13] Information for Responsible Position(s) to Maintain for Audits
nsurance of Adequale Long-Term neration and Maintenance of Post- nstruction BMPs through Operation and Maintenance Plans and Agreements	Long-term maintenance of post- construction BMPs	The Stark SWCD and City of Canton require Long-Term Maintenance Plans (LTMPs) to be developed for all applicable sites required to implement post-construction storm water quality BMPs. Stark SWCD reviews LTMPs for appropriate content in accordance with permit expectations. Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in inspecting post-construction storm water quality BMPs, informing the responsible entity/operator (i.e. the person/party named in the LTMP) and City of Canton of all required maintenance. If the maintenance items are not completed by the responsible entity/operator in the timeline given by the SWCD, the SWCD will notify the City of Canton so that the City can take the appropriate enforcement/penalty actions to	Required per Part III.B.5.d and Part III.B.5.e.vi.	Maintenance" (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and	Yes	Stark SWCD: Urban Resource Coordinator	Yes	(1) Renew MOU between City and Stark SWCD annually; and (2) Ensure LTMPs are in place for applicable sites  (3) Perform annual inspection of post- construction WQ BMPs	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance	WQ BMPs performed and frequency of	(1) Copy of MOU and payment verification; and (2) Copies of LTMPs
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3/30/2010

	CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP)	Revised
	(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations	
CM Permit Requi	rement(s)	
Part III.B.6.a. Part III.B.6.b.	[City of Canton] shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and  Using training materials that are available from Ohio EPA or other organizations, [City of Canton's] program shall include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance; and	
Part III.B.6.c.	[City of Canton] shall include a list of industrial facilities [it] owns or operates that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to [City of Canton's] MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI form for each facility. For [City of Canton's] municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots, and waste transfer stations, a Storm Water Pollution Prevention Plan (SWP3) shall be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR0000004). [Since City of Canton's] coverage under this general permit was granted [6/4/09].	
Respons	The City of Canton owns/operates three "industrial facilities" that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to the City's MS4:  1) Canton Water Pollution Control Center - NPDES Permit No. 3PE00000*OD  2) Canton Water Department (NE) - NPDES Permit No. 3IY00011011  3) Canton Water Department (NW) - NPDES Permit No. 3IY00010*ED  The City owns/operates another facility, Canton Water Department (SC) - NPDES Permit No. 3IY00012*ED (in Sugar Creek Township, Stark County), that is subject to the Ohio EPA's individual NPDES permit for discharges of storm water associated with industrial activity but does <i>not</i> ultimately discharge to a City MS4 because the facility is not located within the City of Canton's corporation limits nor is it located within an urbanized area.  For development of SWP3s for applicable municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, see "Service Center SWP3" and "Fire Station #1 SWMP" BMPs below for further details.	1/21/201
Decision Process	(Rationale Statement) for Development of Pollution Prevention/Good Housekeeping - Operations and Maintenance (O&M) Program	
Part III.B.6.d.	[City of Canton] shall document [its] decision process for the development of a pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.	
Respons	e: The City of Canton supports EPA's assessment that the City must examine and subsequently alter its own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterway and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. While implementing a Pollution Prevention/Good Housekeeping Program is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the City of Canton since proper and timely maintenance of MS4s can help avoid repair costs from damage caused by age and neglect. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.  The City of Canton is to implement the BMPs described below as part of its Pollution Prevention/Good	/s; 1/21/201
Part III.B.6.d.	Housekeeping for Municipal Operations" on USEPA's National Menu of Stormwater Best Management Practices at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/</a> for further BMP guidance and information.  The rationals statement shall include the following information, at a minimum:	
Part III.B.6.d.i.	[City of Canton's] operation and maintenance program to prevent or reduce pollutant runoff from [its] municipal operations. [City of Canton's] program shall specifically list the municipal operations that are impacted by this operation and maintenance program.	
Respons	e: The City of Canton Service Center (located at 2436 30th St NE, Canton, OH 44705) is made up of the following City departments: Engineering (Civil and Traffic Divisions), Parks, Police Impound, Sanitation, Street, Collection Systems (Sewer), Motor Vehicles (vehicle maintenance), and Recreation. These departments are directly or indirectly involved with certain municipal operations such as roadway maintenance, storm and sanitary sewer maintenance, fleet maintenance, new infrastructure planning and construction, etc. These activities can ultimately have impacts on the quality of storm water runoff and the receiving local water bodies. Therefore, this MCM impacts the operations performed by the departments that make up the City Service Center more than any other City departments. However, other City Departments may have certain responsibilities pertaining to this MCM as well. City departments/facilities that are affected by or responsible for respective BMPs are provided below.	1/21/201
Part III.B.6.d.ii.	Any government employee training program [City of Canton] will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing available materials [City of Canton] plans to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.	θ
Respons	The City of Canton is required to train government employees on ways to prevent or reduce storm water pollution prevention from municipal activities. See "Government employee training/education" BMP below for further details.	3/8/2010
Part III.B.6.d.iii.	[City of Canton's] program description shall specifically address the following areas:	
Part III.B.6.d.iii.1.	Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [City of Canton's] MS4.	
Respons	se: The City of Canton is required to address maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4. See all respective BMPs below for further details.	1/21/201
Part III.B.6.d.iii.2.	Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas [City of Canton] operates. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or a combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from highway and municipal parking lot winterization activities.	r
Respons	se: The City of Canton is required to implement controls for reducing or eliminating the discharge of pollutants from the identified sources and provide descriptions of winter management materials and a rationale for their associated application rates. See all respective BMPs below for further details.	1/21/201
Part III.B.6.d.jij.3.	Procedures for the proper disposal of waste removed from [City of Canton's] MS4 and [its] municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.	
Respons	se: The City of Canton is required to implement procedures for the proper disposal of waste removed from the MS4 and municipal operations. See all respective BMPs below for further details.	1/21/201
Part III.B.6.d.iii.4.	Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.	::
Respons	se: The City of Canton is required to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of water quality protection devices. See "Water quality considerations for flood management projects" BMP below for further details.	1/21/201
Part III.B.6.d.iv.	Who is responsible for overall management and implementation of [City of Canton's] pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.	
Respon	se: The City of Canton interprets the term "pollution prevention/good housekeeping program" to be synonymous with the term "operation and maintenance program" as used elsewhere in the permit for describing the requirements of this MCM. Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's Pollution Prevention/Good Housekeeping Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Each responsible position is to maintain all records of supporting information for respective BMP implementation.	1/21/201
Part III.B.6.d.v. Respon	How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.  se: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to Chris Barnes of the City Engineering Department by February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully	or 1/21/201
Performance Star	ndards	
Part III.B.6.e.	[City of Canton's] pollution prevention/good housekeeping program shall include, at a minimum, annual employee training. [City of Canton's] operation and maintenance program shall include appropriate procedures, controls, maintenance schedules, and recordkeeping to address Part III.B.6.d.iii of this permit.	
Annual Reporting	Annual Reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for O&M Program.	<u> </u>

				CITY OF CANTON, OHIO: NPDES P					The state of the s					
Marketon (c.				(Part III.B.6.) Minimum Control Measure (M						ıı Operatı	ons			
per	The second section was a	d Maintenance rt III.A.1.a.	Program" (a.k.a.	"Pollution Prevention/Good Housekeeping Program"): Best Managem	Part III.A.1.e.	vir s#Requiremen	Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
1) NP #		[2] Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goaf(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
1	training reduce po	ment employee to prevent and e storm water ollution	Government employee training/education	Such training is required per Part III.B.6.a.	and b. and Part III.B.	6.e. This requirement i	s addressed ui	nder MCM #1. See "0	Government emplo	yee training/ed	ucation" BMP under MC	CM #1 for details.		
2	ies that conduct activities described in 40 CFR ineral Permit coverage, including (continued on	nance facilities	Division of Motor Vehicles SWP3	The City's Division of Motor Vehicles (DMV) is the City vehicle maintenance facility located at the City Service Center: 2436 30th St NE, Canton, OH 44705). This facility falls within the designated categories of "industrial facilities" that the City owns or operates. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR0000004))	Yes	Division of Motor Vehicles (DMV)	DMV: Superintendent	No	Annually ensure USEPA's "No Exposure Certification" applies	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if "No Exposure" can be certified	Completed "No Exposure Certification"
3	ution Prevention Plans (SWP3s) for municipal facilities are not required to obtain Industrial Storm Water Gene next page):	Vehicle mainter	Fire Station #1 SWP3	City Fire Station #1 is located at 110 7th St SW, Canton, OH 44702. Fire Station #1 falls within the designated categories of "municipal facilities" that the City owns or operates because it has a vehicle maintenance facility where Fire Department owned/operated vehicles are serviced/maintained. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004))	Yes	Fire Stalion #1	Fire: Fire Chief	No	Annually ensure USEPA's "No Exposure Certification" applies	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if "No Exposure" can be certified	Completed "No Exposure Certification"
	hat	Bus terminals		SWP3s for bus lerminals are required per Part III.B.6.c. h	However, the City of C	Canton does not own or	operate any b	ous terminals and the	refore is not requir	ed lo develop a	and implement an SWP3	3 for such.		
	Storm Vrater I 122.26(t)(14) t	Composting facilities		SWP3s for composting facilities are required per Part III.B.6.c. I	However, the City of C	Canton does not own o	operale any c	composting facilities a	and therefore is not	required to de	velop and implement ar	SWP3 for such.		

				CITY OF CANTON, OHIO: NPDES P	HASE II ST	ORM WAT	ER MAN	AGEMENT	PROGRA	M (SW	MP)			
				(Part III.B.6.) Minimum Control Measure (M	CM) #6: Pollut	tion Prevention	n/Good Ho	ousekeeping f	or Municipa	ıl Operati	ons			
'Oper	ation an	d Maintenance	Program" (a.k.a.	"Pollution Prevention/Good Housekeeping Program"): Best Managem	ent Practices (BN	/IPs)/Requiremen	ts used to S	atisfy MCM Requ	Jirements					
	Pa	rt III.A,1.a.	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
[1] BMP #	Permil	[2] Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
4	ater Pollution Prevention Plans (SWP3s) for all facilities(continued from previous page)	Impoundment lots	Impound Lot SWP3	The City's Police Department Impound Lot falls within the designated categories of "municipal facilities" (impound lots) that the City owns or operates. The Impound Lot is where impounded vehicles are taken and stored until the vehicle owners pay to retrieve the vehicles or the vehicles are sold via auction. The Impound Lot is located at the City Service Center: 2436 30th St NE, Canton, OH 44705). However, per footnote #2 on Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, the City Impound Lot does not have a vehicle maintenance shop, does not perform equipment cleaning operations, and does not perform airport deicing operations. Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).	Required per Part III.B.6.c.	(See Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and Industrial Storm Water General Permit (OHR0000004))	Yes	Police (Impound)	Police: Lieutenant	No	Annually verify status of Impound Lot with current Ohio EPA Industiral Facility SWP3 applicability	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	Indication if SWP3 must be developed and implemented	Supporting documentation, as applicable
	Storm Water I municipal fac	Waste transfer slations		SWP3s for waste transfer stations are required per Part III.B.6.c. H	lowever, the City of C	anton does not own or	operate any w	asle transfer stations	and therefore is n	ot required to	develop and implement	an SWP3 for such	1,	
5	ance activities, schedules, and long-term inspection dures for controls to reduce floatables and other ants to [and from] MS4 (continued on next page)	Maintenance activities (continued on next page)	Street sweeping	Streets, roads, highways and parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by street sweeping. Street sweeping can also improve the aesthetics of municipal roadways, control dust and decrease the accumulation of pollutants in catch basins. An effective municipal street sweeping program can meet regulatory requirements, assess street sweeping effectiveness, and minimize pollutants in roadways. Street sweeping is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Street Department performs routine sweeping of city streets throughout the year. Maintenance and inspection schedules have been developed for certain City streets.	BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.	"Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and  (2) continue to perform street sweeping to reduce floatables and other pollutants to and from the MS4; and  (3) sweep City streets in accordance with maintenance	Stated goals are easily measurable and/or demand indication if BMP	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) total # of lanemiles swept; and  (3) indication if streets are swept in accordance with maintenance	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and  (2) sweeping records documenting lanemiles swept; and  (3) copy of maintenance schedules indicating

	Part III.A.1.a.	Part III.A.1.a.	"Pollution Prevention/Good Housekeeping Program"): Best Managem	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
1) NP #	[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
	uce floatables and other pollutants to page)	Lots used for public parking	Municipal parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by lot sweeping. Lot sweeping can also improve the aesthetics of municipal lots, control dust and decrease the accumulation of pollutants in catch basins. Lot sweeping is a maintenance activity the City performs, as necessary, to reduce floatables and other pollutants to and from the MS4.  Municipal (City-owned) parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various	BMP assists in	"Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution		Engineering (Traffic: Parking)	Engineering (Traffic): Assistant City Engineer	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and  (2) sweep all publicuse parking lots/decks a minimum of 4 times per year	Stated goals are easily measurable and/or demand indication if	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) locations/names of public-use lots/decks and # of times swept per year	(1) Printout of curren referenced USEPA BMP descriptions; an date(s) reviewed with employees; and # of employees reviewed with; and  (2) respective sweeping records documenting lots/decks swept
	oction procedures for controls to reduce need from previous page and on next page and each of the page and continued from previous page activities (continued from previous pages	Lots used for City employee parking	public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). All public-use parking lots are maintained by the Traffic: Parking Division of the City Engineering Department, while the maintenance of all City employee parking lots is typically the responsibility of the respective departments utilizing the lots.  Scheduled sweepings are typically performed on public-use lots, while visual inspections are used to determine the need for lot sweeping on City employee lots. The Engineering Traffic: Parking Division and Street Department both have street sweepers that are used as necessary, for public-use and City employee lots, respectively, or lot sweeping may be contracted out if desired.		Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and  (2) perform lot sweeping as requested by respective departments utilizing lots	BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) locations of City employee lots swept and # of times swept per year	(1) Printout of currer referenced USEPA BMP descriptions; ar date(s) reviewed with employees; and # of employees reviewed with; and  (2) respective sweeping records documenting lots/decks swept
	activities, schedules, and long-term insp [and from] MS4 (contin	Storm drain system cleaning	Storm drain system cleaning is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Collection Systems (Sewer) Department performs catch basin, manhole, and storm line cleaning throughout the year. Priority is typically given to certain storm sewer systems (such as those serving main streets and highways) while others are cleaned based on responses to complaints.	BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.	"Storm Drain System Cleaning" (under USEPA MCM#6: Pollution Prevention Good Housekeeping for Municipal Operations)	/ Yes	Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent	No .	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to perform storm sewer system cleaning to reduce floatables and other pollutants to and from the MS4	measurable and/or demand indication if BMP implementation	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) # of manholes and catch basins cleaned; and footage of storm lines cleaned	(1) Printout of curre referenced USEP. BMP descriptions; a date(s) reviewed w employees; and # employees reviewed with; and (2) storm sewer system cleaning records

				CITY OF CANTON, OHIO:	NPDES PHASE II ST	ORM WAT	ER MAN	AGEMENT	PROGRA	AM (SW	MP)			
				(Part III.B.6.) Minimum Control I	Measure (MCM) #6: Pollu	tion Preventio	n/Good Ho	usekeeping :	for Municip	al Operati	ons			
'Oper	ation an	d Maintenance	Program" (a.k.a.	"Pollution Prevention/Good Housekeeping Program"): B	est Management Practices (BI	/IPs)/Requiremen	ts used to S	atisfy MCM Req	uirements					
		rt III.A.1.a.	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
[1] BMP #	Permit	[2] Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
8	m inspection her pollutants to page)		Dry-weather field- screening of storm water outfalls	Maintenance activities, schedules, and long-term inspection procedures	s for controls to reduce floatables and o help satisfy requirements of M	ther pollutants to [and ICM #3. See "Dry-wea	from] MS4 are other field-screen	required per Part III. ning of storm water o	B.6.d.iii.1, This Bit outfalls" BMP und	MP is an inspec er MCM #3 for	ition procedure that assi details.	sts in satisfying th	ne permit requirement	and is also performed to
9	ules, and long-ter floatables and ot led from previous	procedures	Sewer televising	Maintenance activities, schedules, and long-term inspection procedures	s for controls to reduce floatables and c help satisfy r	other pollutants to [and equirements of MCM	from] MS4 are #3. See "Sewer	required per Part III. televising" BMP und	B,6.d.iii.1. This BI der MCM #3 for de	∕lP is an inspeα tails.	clion procedure that assi	sts in satisfying th	ne permit requirement	and is also performed to
Sewer dye-lesting  Long-term maintenance of post-one for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM #3. See "Sewer dye-testing" BMP under MCM #3 for details.  Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP includes an inspection procedure that assists in satisfying the permit requirement and is necessary to be a performed to help satisfy requirements of MCM #5. See "Long-term maintenance of post-construction BMPs" BMP under MCM #5 for details.										and is also performed to				
11	Maintenance procedures for co [and fro		•	Maintenance activities, schedules, and long-term inspection procedu	ures for controls to reduce floatables ar performed to help satisfy requiremer	nd other pollutants to [ nts of MCM #5. See "L	and from] MS4 a	are required per Par enance of post-cons	t III.B.6.d.iii.1. This truction BMPs" BN	s BMP includes MP under MCM	an inspection procedur #5 for details.	e that assists in s	alisfying the permit red	guirement and is also
12	ge of		Street sweeping											
Streets, roads, highways highways highways Streets are BMPs are BMPs are BMPs are BMPs are BMPs implemented by the City to assist in satisfying this permit requirement as well as others. See the respective BMP description under MCM #6 for details.  Controls for reducing or eliminating the discharge of pollutants from streets, roads, and highways are required per Part III.B.6.d.iii.2. The identified BMPs are BMPs implemented by the City to assist in satisfying this permit requirement as well as others. See the respective BMP description under MCM #6 for details.											ective BMP descriptions			
14	minating thued on n		Proper winter materials management											
15	r eli		Lot sweeping											
16   Value of the parking garages   Municipal parking lots (including parking garages)   Municipal parking garages   Municipal parking garages   Municipal parking garages   Storm drain system cleaning   Storm drain s										ell as others. See the				
17	1 =		Proper winter materials management											

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

	Part III.A.1.a.	Part III,A.1.a.	"Pollution Prevention/Good Housekeeping Program"): Best Manageme	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
] 1P	Part II.A.T.a. [2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audit
	ext page):						Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent		(1) Annually review		(1) Indication if referenced USEPA	(1) Printout of curre
	ige and on ne						Engineering	Engineering: City Engineer		referenced USEPA BMP descriptions with appropriate department/ facility		BMP descriptions were reviewed with appropriate department/ facility	BMP descriptions; a date(s) reviewed w employees; and # employees review
	evious pa						Parks	Parks: Director		employees; and		employees; and	wilh; and
	from (continued from pri						Recreation	Recreation; Director		(2) identify current	Stated goals	(2) summary of current	(2) list of currer applicable departn landscaping
	nls from (con	Proper municipal	Municipal lawn and garden and landscaping activities can contaminate stormwater with pesticide, soil, herbicide, and fertilizer runoff. Proper landscape management, however, can effectively reduce water use and contaminant runoff, and enhance a property's aesthetics. Environmentally friendly landscape management protects the environment	BMP assists in	"Municipal Landscaping" (unde USEPA MCM#6:		Water Reclamation Facility (WRF)	WRF: Superintendent	No	municipal landscaping practices that are in conformance with applicable USEPA recommendations;	are easily measurable and/or demand indication if BMP	landscaping responsibilities/ practices that are in conformance with applicable USEPA	responsibilities practices and description of the conformance wi
	of polluta	landscaping	through careful planning and design, routine soil analysis, appropriate plant selection, use of practical turf areas and mulches, efficient water use, the reduction, elimination or judicial use of fertilizers, herbicides, and pesticides, and appropriate maintenance. As applicable, City departments that have a role in municipal landscaping are to implement use such practices accordingly.	satisfying Part III.B.6.d.iii.2.	Pollution Prevention Good Housekeeping for Municipal Operations)	1	Street	Street: Superintendent	140	and	implementation is in accordance with permit	recommendations; and	USEPA recommendation and
	the discharge		use such practices accordingly.				Fire	Fire: Fire Chief		(3) identify any	expectations	(3) summary of any deficiencies in current	
	eliminating the						Water	Water: Superintendent		deficiencies in current practices and investigate corresponding BMPs		practices and corresponding status of investigation and implementation of	(3) supporting documentation status of addition
	ducing or						Building Mainlenance	Building Maint.: Superintendent		to implement to be in better conformance with USEPA recommendations;		additional BMPs to implement to be in better conformance with USEPA	BMP investigation implementation, applicable; and
	ntrols for re						Civic Center	Civic Center: Manager		and		recommendations, as applicable; and	

			(Part III.B.6.) Minimum Control Measure (M						al Operati	ons			
Oper	ation and Maintenar	ice Program" (a.k.a.	"Pollution Prevention/Good Housekeeping Program"): Best Managem	ent Practices (Bl	MPs)/Requiremen		atisfy MCM Requ		φ		- controllation - control		
[1] BMP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a. [3] BMP Name	Párt III.A.1.a. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?		Pert III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f.  [13]  Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C.  [14]  Information for Responsible Position(s) to Maintain for Audits
	nued from previous page and on next page):		Fueling (leets of municipal vehicles can generate spills and leaks of fuel (gasoline and				DMV (for Service Center)	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and  (2) identify current fueling station practices/ features tha are in conformance with USEPA recommendations; and	t Stated goals	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) summary of current facility practices/ features that are in conformance with USEPA recommendations; and	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and  (2) description of respective fueling station; and list of current practices/ features at station and description of their conformance with USEPA recommendations;
19	ng the discharge of pollutants from (contir	Proper municipal vehicle fueling	diesel fuel) and heavy metals - disproportionately toxic compounds that if washed into the storm drain system by stormwater runoff can seriously impair the water quality of nearby waterbodies. Various BMPs can be implemented at fueling stations to reduce or prohibit fuels from washing into adjacent storm drainage systems. The City of Canton operates 4 municipal vehicle fueling stations. To discourage illicit discharges from the Service Cente fueling station, the City provides the following BMPs: covered fuel area (prohibits direct rainfall contact) and catch basins with water quality inserts (see "Catch basins with water quality inserts" BMP for details). Spill cleanup materials are to be available at all four vehicle fueling stations. In cases of fuel spills on the ground surface, trained employees are to attempt to utilize absorbant materials accordingly to ensure no fuels wash into storm drainage systems.	BMP assists in satisfying Part III.B.6.d.iii.2.	"Municipal Vehicle Fueling" (under USEPA MCM#6: Pollution Prevention Good Housekeeping for Municipal Operations)	I	DMV (for Sign & Paint Shop)	DMV: Superintendent	No	(3) identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement at respective fueling stations to be in better conformance with USEPA recommendations; and	are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(3) summary of any deficiencies in current practices/ features and corresponding status of investigation of additional BMPs/ features to implement to be in better conformance with USEPA recommendations, as applicable; and	(3) supporting documentation of status of additional BMP/ features investigation and implementation, as applicable; and
	for reducing or eliminating the						WRF	WRF: Superintendent	No	(4) ensure spill prevention plans and cleanup materials are readily available at each fueling station; and		(4) indication if spill prevention plans and cleanup materials are provided at fueling station; and	1 2 2
	Controls for						Water (for Sugarcreek WTP)	Water: Superintendent	No	(5) ensure appropriate employees are trained to properly respond to fuel spills	i	(5) # of employees properly trained to respond to fuel spills	(5) description of respective training, dates, and employee names

## CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

"Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.B.6.f. Part IV.B. & C. Part III.A.1.a. Part III.A.1.e. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.c. Part III.A.1.e. Part III.A.1.a. Part III.A.1.a. [9] [10] [11] [12] [13] [14] [4] [2] [3] leasurable Goal(s) Rationale for Information for Information for Rationale for BMP Further Guidance Responsible Legal City ВМР BMP Name BMP Description Agreement Permit Requirement Selection (see USEPA's Authority to Depts/Facilities Entity/ City Needed? for Each Measurable Responsible Responsible Position(s) to Position(s) to Responsible National Menu of (Division) with Dept(s): Goal(s) Position Document for Maintain for Audits Stormwater BMPs significant Position(s) Annual Reports Website) involvement (1) Printout of current (1) Indication if (1) Annually review referenced USEPA referenced USEPA referenced USEPA BMP descriptions BMP descriptions: and 5 BMP descriptions with were reviewed with date(s) reviewed with and appropriate appropriate employees; and # of department/ facility department/ facility employees reviewed employees; and employees; and with; and (2) identify current (2) list of current vehicle and equipment (2) summary of current practices and Common activities at municipal maintenance shops include parts cleaning, vehicle fluid maintenance practices practices in description of their replacement, and equipment replacement and repair. Automotive maintenance facilities that are in conformance with conformance with are considered to be stormwater "hot spots." Hotspots are areas that generate significant conformance with **USEPA** loads of hydrocarbons, trace metals, and other pollutants that can affect the quality of USEPA **USEPA** recommendations; DMV: recommendations: stormwater. Some of the wastes generated at automobile maintenance facilities include: DMV recommendations; and solvents (degreasers, paint thinners, etc.); and antifreeze; and brake fluid and brake pad Superintendent and Stated goals dust; and battery acid; and motor oil; and fuel (gasoline, diesel, kerosene); and lubricating are easily grease; and etc. Fluid spills and improper disposal of materials result in pollutants, heavy "Municipal Vehicle (3) identify any measurable metals, and loxic materials entering ground and surface water supplies, which can create and Equipment deficiencies in curren (3) summary of any and/or demand Maintenance" (under public health and environmental risks. practices and deficiencies in current Proper municipal BMP assists in indication if USEPA MCM#6: investigate practices and vehicle and BMP 20 satisfying Part (3) supporting Pollution Prevention/ corresponding BMPs corresponding status equipment III.B.6.d.iii.2. plementation documentation of Good Housekeeping maintenance to implement at of investigation of status of additional for Municipal additional BMPs to respective accordance BMP investigation and ō Operations) maintenance garages implement to be in with permit implementation, as to be in better better conformance applicable; and conformance with with USEPA USEPA ecommendations, as recommendations; applicable; and and (4) summary of (4) ensure spill (4) indication if spill implementation status prevention plans and prevention plans and of spill prevention cleanup materials are cleanup materials are plans and cleanup reducing or 6 readily available at provided at The City of Canton has two main municipal vehicle and equipment maintenance facilities materials; and copy of naintenance facilities each maintenance (at Division of Motor Vehicles and Fire Station #1). Various BMPs are in place at each Fire (Fire Station spill prevention plan Fire: Fire Chief No garage; and and facility to discourage or prevent the possibility of illicit discharges into the MS4 as a result of municipal vehicle and equipment maintenance. Irols for (5) ensure appropriate (5) description of (5) # of employees employees are trained respective training, properly trained to to properly respond to dates, and employee respond to spills

spills

Oper	ration and Maintenanc	e Program" (a.k.a	(Part III.B.6.) Minimum Control Measure (Minimum Prevention/Good Housekeeping Program"): Best Manageme	at the first database and the contract of	the state of the s	Contract Con	The series of the state of the defendant of the series of the series of the series of	The state of the s	200				
	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
[1] BMP #	[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
			Municipal vehicle washing can generate dry weather runoff contaminated with detergents, oils, grease, and heavy metals. Vehicle washing BMPs can eliminate contaminated wash water discharges to the storm sewer system. Such BMPs include installing wash racks that discharge wash water to the sanitary sewer, and contracting the services of commercial car washes, which are permitted to discharge wash water to the sanitary sewer system.				DMV: indoor washing at DMV	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with		(1) Indication if referenced USEPA BMP descriptions were reviewed with	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with
	next page): on next page)						Street: indoor washing at Street Dept	Street: Superintendent	No	appropriate department/ facility employees; and		appropriate department/ facility employees; and	employees; and # of employees reviewed with; and
	ious page and on r		The City Service Center has 4 indoor vehicle washing bays (at Division of Motor Vehicles, Street Department, Parks Department, and Collection Systems (Sewer) Department). The City Water Reclamation Facility and Water Department also have indoor vehicle washing bays. All of these indoor bays have floor drains that connect to sanitary sewers.				Parks: indoor washing at Parks Dept	Parks: Director	No	(2) identify current municipal vehicle and equipment washing practices/ features that		(2) summary of current practices/ features in conformance with	(2) list of current practices/ features and description of their conformance with
	from (continued from prevented)				"Municipal Vehicle		(Sewer): indoor washing at Sewer Dept	Collection Systems (Sewer); Superintendent	No	are in conformance with USEPA recommendations; and	Stated goals are easily measurable and/or demand indication if BMP	USEPA recommendations; and	USEPA recommendations;
21	of pollutants from (oc	Proper municipal vehicle and equipment washing	The City Service Center has an outdoor wash area that is sometimes used by various	BMP assists in satisfying Part III.B.6.d.iii.2.	and Equipment Washing" (under USEPA MCM#6: Pollution Prevention Good Housekeeping for Municipal		Street: outdoor washing at Service Center	Street: Superintendent	No		implementation is in accordance with permit expectations		
	minating the discharge		departments to rinse off vehicles and equipment. In an attempt to reduce pollutant discharges into the adjacent storm sewer system, in 2007 the Street Department installed jersey barriers at the outdoor wash area just upstream from the adjacent catch basin that drains the area. In addition, hay bales are placed adjacent to the jersey barriers. The combination of the jersey barriers and hay bales slows down the wash runoff and helps to filter out large debris and floatables. Any smaller debris that enters the catch basin is		Operations)		Water Reclamation Facility (WRF): indoor washing at WRF	WRF: Superintendent	No	(3) identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement		(3) summary of any deficiencies in current practices/ features and corresponding status of investigation of additional BMPs/	(3) supporting documentation of status of additional BMP/ feature
	reducing or elli		treated by a water quality insert (see "Catch basins with water quality inserts" BMP).				Water: indoor washing at Water Dept	Water: Superintendent	No	at respective washing facilities to be in better conformance with USEPA recommendations	×	features to implement to be in better conformance with USEPA recommendations, as applicable	investigation and implementation, as applicable
	Controls for		All Fire Department vehicles are washed indoor at each station. The cleaning solution uses biodegradable surfactants, containing no soap or caustic agents.				Fire: washing at fire stations	Fire: Fire Chief	No				
			The City annually contracts with local commercial car washes for washing of other City vehicles used by various departments, as necessary. All commercial car washes are required to have wash water treated via sanitary sewer.				(Various): washing at private car washes	Mayor: Service Director	Yes	Continue to annually contract with local car washes for washing of City vehicles	Stated goal is easily measurable and/or demands indication if BMP	Indication if annual contract with commercial car washes is in place	Copy of contract

### CITY OF CANTON, OHIO: NPDES PHASE II STORM WATER MANAGEMENT PROGRAM (SWMP) (Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations "Operation and Maintenance Program" (a.k.a. "Pollution Prevention/Good Housekeeping Program"): Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements Part III.A.1.c. Part III.B.6.f. Part IV.B. & C. Part III.A,1.a. Part III.A.1.a. Part III.A.1.a. Part III.A.1.e. Part III.A.1.b. Part III.A.1.d. Part III.C. Part III.A.1.e. [13] [10] [11] 1121 [14] [4] [9] [2] BMP Permit Requirement BMP Name **BMP Description** Rationale for BMP Further Guidance Legal City Responsible Agreemer easurable Goal(s) Rationale for Information for Information for (see USEPA's Authority to Depts/Facilities Entity/ City Needed? for Each Measurable Responsible Responsible Selection National Menu of (Division) with Dept(s): Responsible Goal(s) Position(s) to Position(s) to Implement! Stormwater BMPs Position(s) Position Selection Document for Maintain for Audits significant Website) Annual Reports involvement Collection (1) Annually review (1) Indication if Printout of current Collection Systems Systems applicable referenced referenced USEPA referenced USEPA No (Sewer) (Sewer): **USEPA BMP** BMP descriptions BMP descriptions; and Superintendent descriptions with were reviewed with date(s) reviewed with Engineering Engineering (Traffic: appropriate appropriate employees; and # of (Traffic): Signal, Sign & department/ facility department/ facility employees reviewed No Assistant City Responsible management of common chemicals, such as fertilizers, solvents, paints, Paint; Parking) employees; and employees; and with: and cleaners, automotive products, and hazardous materials can significantly reduce polluted Engineer (2) identify current runoff. Such products must be handled properly in all stages of development, use, and (2) list of current disposal. Proper materials management entails the selection of the individual product, the (2) summary of current materials Fire stations Fire: Fire Chief No practices and correct use and storage of the product, the responsible disposal of associated waste(s), management practices practices that are in description of their and the proper responses to spills. Proper materials management reduces the likelihood that are in conformance with conformance with USEPA of accidental spills or releases of hazardous materials during storm or flooding events. In conformance with USEPA addition, health and safety conditions at the facility will improve. USEPA recommendations; Parks Parks: Director No recommendations; ecommendations, as and and applicable; and (3) summary of any Police (Impound Police: (3) identify any No deficiencies in current Lieutenant deficiencies in curren practices and practices and (3) supporting corresponding status "Materials investigate documentation of Stated goals of investigation of Management", corresponding BMPs status of additional Recreation: Hazardous Materials additional BMPs to Recreation are easily to implement to be in Director BMP investigation and implement to be in Storage", "Municipal measurable better conformance implementation, as Facilities better conformance and/or demand with USEPA applicable: and BMP assists in Management" and indication if with USEPA recommendations; Sanitation: Proper materials 22 satisfying Part 'Spill Response and Yes No BMP recommendations, as Simple practices for proper materials management include improving maintenance of Sanitation management Superintendent and III.B.6.d.iii.2. mplementation applicable; and Prevention" (under machinery; and using drip pans for leaky containers or equipment until repairs can be made; and establishing material storage and inventory controls (especially for hazardous USEPA MCM#6: Pollution Prevention/ accordance materials); and improving routine cleaning and inspection of facilities where materials are Water Reclamation WRF: and stored or processed; and storing materials indoors or under roof; and ensuring fueling Good Housekeeping with permit No Facility (WRF) Superintendent for Municipal expectations areas are under roof; and providing tarps for materials that must be kept outside; and (4) summary of (4) ensure spill (4) indication if spill ensuring dumpsters have lids; and maintaining organized workplaces; and securing lids Operations) mplementation status prevention plans and prevention plans and on containers; and stacking containers in accordance with the manufacturers' directions of spill prevention cleanup materials are cleanup materials are Division of Motor DMV: to avoid damaging the container or the product itself; and No plans and cleanup readily available at ō Vehicles (DMV) provided at respective Superintenden materials; and copy of each department/ department/ facility; spill prevention plan; જ facility; and and Street Street No Superintenden Water Water No Superintendent storing containers on pallets or equivalent structures (this facilitates inspection for leaks and prevents the containers from coming into contact with wet floors; and which can (5) ensure appropriate (5) description of (5) # of employees Building Building Maint. employees are trained respective training. cause corrosion (this consideration also reduces the incidence of damage by pests); and No properly trained to delegating the responsibility for management of hazardous materials to personnel trained Superintendent to properly respond to dates, and employee Maintenance respond to spills and experienced in hazardous substance management; and etc., and educating employees about the benefits of such practices. for Civic Center Civic Center No Manager Stated goals "Manufactured (1) Continue to utilize (1) Indication if such are easily Products for catch basins with catch basins are In 2007, two Nyloplast Catch Basin Insert Storm Pure Infiltration Systems were installed at measurable Stormwater Inlets' water quality inserts at continually utilized at and/or demand two critical storm sewer catch basin locations (downstream from the vehicle fuel pumps (under USEPA critical locations; and critical locations; and

MCM#5: Post-

Construction

Stormwater

Management in New

Development and

Redevelopment)

Street

Superintendent

Street

Yes

indication if

BMP

is in

accordance

with permit

expectations

(2) inspect such catch

basins monthly and

clean/ maintain as

needed

(2) frequency of

inspections and

summary of

associated

maintenance

Supporting

documentation, as

applicable

BMP assists in

satisfying Part

III.B.6.d.iii.2.

and the outdoor vehicle washout area) in the Service Center parking lot. These systems

consist of features that capture sediment, debris, and tiny particles of hydrocarbons and

oil-bound pollutants and therefore prevent or reduce such pollutants from discharging into

the MS4 and ultimately into surface waters. The systems are inspected monthly and

cleaned by the Street Department accordingly.

Catch basins with

water quality inserts

23

				CITY OF CANTON, OHIO: NPDES F	and the second s						The second second second second second			
				(Part III.B.6.) Minimum Control Measure (M						ıl Operati	ons			
pera			CONTRACTOR AND ADDRESS OF THE PARTY OF THE P	"Pollution Prevention/Good Housekeeping Program"): Best Managem		MPs)/Requiremen		Satisfy MCM Req	7	<del>*************************************</del>	Andreas			
L	Pa	t III.A.1.a.	Part III,A.1,a.	Part III.A.1.á.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
IJ MP #	Permit	[2] Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with significant involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
		Waste transfer stations	Controls for redu	cing or eliminating the discharge of pollutants from waste transfer stations are required pe	r Part III.B.6.d.iii.2. Ho	owever, the City of Car	nton does not o	wn or operate any wa	aste transfer statio	ns and therefo	e has no controls for re	ducing or elimina	ting the discharge of po	llutants from such.
24	ge and on next page):	Fleet or maintenance	Indoor storage areas for fleet maintenance	Due to the exposure to weather, fleet or maintenance shops with outdoor materials storage areas have a much higher likelihood of contributing to pollutant runoff than those with indoor storage areas only. The City of Canton owns/operates two fleet maintenance shops (garages). These garages are located at the Division of Motor Vehicles (at City	BMP assists in satisfying Part	"Municipal Vehicle and Equipment Maintenance", "Materials Management", and "Hazardous Material	s Yes	DMV	DMV: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and	measurable and/or demands indication if	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and
4	led from previous pag	shops with outdoor storage areas		Service Center: 2436 30th St NE, Canton, OH 44705) and at Fire Station #1 (at 110 7th S SW, Canton, OH 44702). However, neither of these maintenance garages store any materials outdoors. All fleet maintenance materials are stored indoor.		Storage" (under USEPA MCM#6: Pollution Prevention Good Housekeeping for Municipal Operations)	/	Fire Station #1	Fire: Fire Chief	No	(2) continue to store all respective respective fleet maintenance materials and equipment indoors	BMP implementation is in accordance with permit expectations	(2) indication if all respective fleet maintenance materials and equipment are continually stored indoors	(2) supporting documentation, as applicable
5	lischarge of pollutants from (continu	Salt/sand storage locations	Proper storage of road sall	Many of the problems associated with contamination of local waterways stem from the improper storage of deicing materials. Salts are very soluble when they come into contac with stormwater. They can migrate into ground water used for public water supplies and also contaminate surface waters. The City of Canton has 6 salt domes of which 1 is inactive and another is utilized by ODOT. All salt utilized by the City is stored under roof in the salt domes.	Required per Part III.B.6.d.iii.2.	"Road Salt Application and Storage" and "Roadway and Bridg Maintenance" (unde USEPA MCM#6: Pollution Prevention Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to store all de-icing salt in salt domes	Stated goal is easily measurable and/or demands indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication that all de-icing salt is stored in salt domes	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and  (2) supporting documentation, as applicable
6	Controls for reducting or eliminating the d	Srio.: disposal areas	Proper disposal of snow	The City of Canton Street Department plows snow from City streets. Snow is typically plowed to the side of the streets. Upon heavier snowfalls, parking bans can be issued to make more room for plowed snow. In extremely rare circumstances, excess snow from downtown streets is transported to and disposed of at a City maintenance outpost where after snow melt, remaining debris are swept up as needed.	Required per Part III.B.6.d.iii.2.	"Road Salt Application and Storage", "Roadway and Bridge Maintenance", and "Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and	easily measurable and/or demands indication if BMP implementation is in accordance	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) summary description of snow disposal practices; and indication if any snow was disposed at outposts and the corresponding practices used to control pollutant runoff, as applicable	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and  (2) supporting documentation, as applicable

(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

	Part III.A.1.a.	Part III.A.1,a.	Part III.A.1.a.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
1) VIP #	[2] Permit Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidence (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goal(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
27	Descriptions of materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc or a combination thereof), associated application rates rates	Proper winter materials management	The application and storage of deicing materials, most commonly salts such as sodium chloride, can lead to water quality problems for surrounding areas. Salts lower the melting point of ice, allowing roadways to stay free of ice buildup during cold winters. The City of Canton Street Department annually prepares a written "Snow & Ice Control Program" which describes the City's philosophy of addressing hazardous driving conditions created by winter weather and the means by which the City addresses snow and ice accumulation on City streets. The Snow & Ice Control Program describes rock salt as being a very effective chemical de-icer in temperatures above 20°F. To enhance the melting capability of rock salt, the City uses magnesium chloride or Geomell at temperatures below 20°F. Application rates of treated rock salt are approximately 6 gallons per ton of rock salt.	Required per Part	"Road Salt Application and Storage" and "Roadway and Bridge Maintenance" (under USEPA MCM#6: Pollution Prevention, Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) identify current deicing/ anti-icing materials and application practices that are in conformance with USEPA recommendations; and (3) identify any deficiencies in current deicing/ anti-icing materials and/or practices and investigate corresponding materials BMPs to implement to be in better conformance with USEPA recommendations; and  (4) track the annual usage of de-icing/ anti-icing management materials and application rates	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) summary of current de-icing/ anti-icing materials and practices that are in conformance with USEPA recommendations; and  (3) summary of any deficiencies in current de-icing/ anti-icing materials and/or practices and corresponding status of investigation of additional materials and/or BMPs to implement to be in better conformance with USEPA recommendations, as applicable; and  (4) summary of annual usage of de-icing/ anti-icing materials, application rates, and rationale for rates	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and (2) list of current deicing/ anti-icing materials and practices and description of their conformance with USEPA recommendations; and  (3) supporting documentation of status of additional BMP investigation and implementation, as applicable; and

(Part III.B.6.) Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

per	ition and Maintenanc	e Program" (a.k.a. ʻ	"Pollution Prevention/Good Housekeeping Program"): Best Managem	ent Practices (BI	/IPs)/Requiremen	ts used to S	Satisfy MCM Requ	iirements					
1] MP #	Part III.A.1.a. [2] Permit Requirement	Part III.A.1.a [3] BMP Name	Part III.A.1.á. [4] BMP Description	Part III.A.1.e. [5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	Part III.A.1.b. [7] Legal Authority to Implement?	[8] City Depts/Facilities	Part III.A.1.d. [9] Responsible Entity/ City Dept(s): Position(s)	Part III.C. [10] Agreement Needed?	Part III.A.1.c. [11] Measurable Goal(s) for Each Responsible Position	Part III.A.1.e. [12] Rationale for Measurable Goal(s) Selection	Part III.B.6.f. [13] Information for Responsible Position(s) to Document for Annual Reports	Part IV.B. & C. [14] Information for Responsible Position(s) to Maintain for Audits
	bottom ash, etc or a ation rates	Lots used for public parking					Engineering (Traffic: Parking)	Engineering (Traffic): Assistant City Engineer	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and		(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and	(1) Printout of currer referenced USEPA BMP descriptions; ar date(s) reviewed wit employees; and # o employees reviewed with; and
	ization (use of salt, sand, ale for the selected applic		The application and storage of de-icing materials, most commonly salts such as sodium chloride, can lead to water quality problems for surrounding areas. Salts lower the melting		"Road Salt		Parks	Parks: Director	No	(2) identify current de- icing/ anti-icing materials and application practices that are in conformance with USEPA recommendations; and	Stated goals	(2) summary of current de-icing/ anti-icing materials and practices that are in conformance with USEPA recommendations; and	(2) list of current de icing/ anti-icing materials and practices and description of thei conformance with USEPA recommendations and
8	municipal parking lot wire cation rates, and the rate spoot of spoots and spoots and spoots and spoots and spoots are spoots.	ter materials manag	chloride, carriead to water quality problems for surrounding areas. Salts lower the histing point of ice, allowing parking lots to stay free of ice buildup during cold winters. Municipal (City-owned) parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). All public-use parking lots are maintained by the Traffic: Parking Division of the City Engineering Department, while the maintenance of all City employee parking lots is typically the responsibility of the respective departments utilizing the lots. This maintenance includes snow-plowing and application of de-icing materials, as necessary. There are 5 City departments (Engineering, Park, Street, Water, WRF) that utilize trucks with spreaders for application of de-icing materials (typically salt) on municipal parking	2	Application and Storage" and "Roadway and Bridge Maintenance" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(3) identify any deficiencies in current de-icing/ anti-icing materials and/or practices and investigate corresponding	are easily measurable and/or demand indication if BMP implementation is in accordance with permit	(3) summary of any deficiencies in current de-icing/ anti-icing materials and/or practices and corresponding status of investigation of	(3) supporting documentation o status of additions
	raterials used for roadway and alion thereof), associated appliation thereof	parking	lots. Other department apply de-icing agents by hand, as necessary.				Water	Water: Superintendent	No	materials BMPs to implement to be in better conformance with USEPA recommendations; and	expectations	additional materials and/or BMPs to implement to be in better conformance with USEPA recommendations, as applicable; and	BMP investigation a implementation, a applicable; and
	Descriptions of materi combination						Water Reclamation Facility (WRF)	WRF: Superintendent	No	(4) track the annual usage of de-icing/ anti- icing management materials and application rates		(4) summary of annual usage of de-icing/ anti- icing materials, application rates, and rationale for rates	(4) supporting documentation, a applicable
9		Street sweeping		I.	4	-1			1	·	L	J	
0 1 2	Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization	Lot ottooping	Controls or practices to be used for reducing or eliminating discharges of pollutants res				activities are required BMP descriptions und			ne identified BMPs are Bl	MPs implemente	d by the City to assist in	satisfying this perm
3	activities	Proper winter materials management											

Ope	ration a	nd Maintenance	Program" (a.k.a.	(Part III.B.6.) Minimum Control Measure (Measure						-				
		art III.A,1.a,	Part III.A.1.a.	Part III.A.1.a.	Part III.A.1.e.		Part III.A.1.b.		Part III.A.1.d.	Part III.C.	Part III.A.1.c.	Part III.A.1.e.	Part III.B.6.f.	Part IV.B. & C.
(1) IMP #	Perm	[2] it Requirement	[3] BMP Name	[4] BMP Description	[5] Rationale for BMP Selection	[6] Further Guidance (see USEPA's National Menu of Stormwater BMPs Website)	[7] Legal Authority to Implement?	[8] City Depts/Facilities (Division) with <u>significant</u> involvement	[9] Responsible Entity/ City Dept(s): Position(s)	[10] Agreement Needed?	[11] Measurable Goaf(s) for Each Responsible Position	[12] Rationale for Measurable Goal(s) Selection	[13] Information for Responsible Position(s) to Document for Annual Reports	[14] Information for Responsible Position(s) to Maintain for Audits
34	sal of waste removed from:	Municipal operations	Proper disposal of street sweepings	The City identifies that street sweeping is a municipal operation in which waste is removed and requires procedures for proper disposal. Street sweepings are considered by Ohio EPA to be "solid wastes". Therefore, proper disposal of street sweepings is crucial to meeting permit requirements and expectations of Ohio EPA. The City of Canton takes street sweepings to a local waste transfer station for proper disposal.	Required per Part III.B.6.d.iii.3.	"Parking Lot and Street Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Street	Street: Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and  (2) continue to dispose of wastes resulting from street sweeping as described until further notice requires other procedures	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	(1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and (2) indication if street sweepings are properly disposed of in accordance with EPA solid waste requirements; and summary of waste	(1) Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with; and  (2) supporting documentation, as applicable
35	Procedures for the <i>proper dispo</i>	The MS4 (including dredge spoil, accumulated sediments, floatables, and other debris)	Proper disposal of MS4 wastes	The City identifies that typical waste removed from the MS4 results from practices such as storm line cleaning (including catch basins and manholes) and roadside ditching. Material removed from storm line cleaning is considered by EPA to be "solid waste". Therefore, proper disposal such material is crucial to meeting permit requirements and expectations of Ohio EPA. The City temporarily places materials from storm line cleaning on a dewatering slab that drains to sanitary sewer. After dewatering, the remaining waste is then taken to a landfill. Material removed from roadside ditching typically consists of accumulated sediments (assuming no street sweepings or trash are mixed in), and are not considered by EPA to be solid waste. Sometimes this materials is disposed on sight if conditions are favorable such that the material will not wash back into the ditch. In other cases it is taken to a fill location.	Required per Part III.B.6.d.iii.3.	"Storm Drain System Cleaning" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations)	Yes	Collection Systems (Sewer)	Collection Systems (Sewer): Superintendent	No	(1) Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees; and (2) continue to dispose of wastes removed from the MS4 as described until further notice requires other procedures	Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations	disposed  (1) Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees; and  (2) indication if MS4 wastes are properly disposed of as described; and summary of waste disposed	(1) Printout of curren referenced USEPA BMP descriptions; an date(s) reviewed with employees; and # of employees reviewed with; and  (2) supporting documentation, as applicable
36	new fl project impac and co assess of addi	ures to ensure that cod management is are assessed for its on water quality irrent projects are red for incorporation tional water quality rection devices or practices	Water quality considerations for flood management projects	Any public "flood management projects" that occur in the City of Canton are coordinated through the City Engineering Department. In cooperation with NPDES storm water permitting requirements, qualifying land disturbances (including flood management projects) of one acre or more in the City are assessed for proper water quality practices (See MCM #4 and MCM #5). The Engineering Department has staff that are trained in storm water quantity and quality management. Water quality practices are therefore ensured to be incorporated into all applicable new and redevelopment projects. The incorporation of water quality protection devices or practices on current sites/projects are to be evaluated on a case-by-case basis.	Required per Part III.B.6.d.iii.4.	"Ordinances for Post: Construction Runoff" (under USEPA MCM#5: Post- Construction Stormwater Management in New Development and Redevelopment)	Yes	Engineering	Engineering: City Engineer	No	Continue to implement required procedures as necessary; and identify any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices	Stated goal demands indication if BMP implementation is in accordance with permit expectations	Summary of any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices	Supporting documentation, as applicable